



MONTGOMERY COUNTY **COPY** EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

**ORDER OF THE COUNTY EXECUTIVE SETTING CABLE
TELEVISION RATES FOR THE BASIC SERVICE TIER PURSUANT TO
FCC FORM 1240 FILED OCTOBER 1, 2008**



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Table of Contents

I.	BACKGROUND	1
II.	FINDINGS AND CONCLUSIONS	6
	A. Digital-Only Channels	7
	B. Programming Costs.....	11
	C. Franchise-Related Costs.....	11
	D. Calculation Issues	12
	E. Additional Information Regarding the TV Guide Channel	13
	F. Inflation Adjustment	13
	G. Conclusion	14
III.	ORDERING CLAUSES	15

ATTACHMENT 1: REPORT OF ASHPAUGH & SCULCO, CPAs, PLC



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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ORDER OF THE COUNTY EXECUTIVE SETTING CABLE TELEVISION RATES FOR THE BASIC SERVICE TIER PURSUANT TO FCC FORM 1240 FILED OCTOBER 1, 2008

I. BACKGROUND

1. Montgomery County, Maryland (“County”), has authority to regulate cable operator rates for basic service, equipment and installation under Section 623 of the Cable Communications Policy Act of 1984, 47 U.S.C. § 543, as amended (“Cable Act”), and Montgomery County Executive Regulation No. 08A.29.02 (Oct. 12, 1993) (“Executive Regulation” or “ER”). The Federal Communications Commission (“FCC”) has developed forms that an operator subject to regulation must file to justify such rates.

2. On or about October 1, 2008, Comcast of Potomac, LLC (“Comcast”) filed with the County FCC Form 1240, “Updating Maximum Permitted Rates for Regulated Cable Services” (“2008 Form 1240”), seeking the County’s approval of an increase in the maximum permitted rates for basic service, for the period from January 1, 2009, through December 31, 2009.



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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3. The Office of Cable and Communication Services (the "Office") received and preliminarily reviewed the 2008 Form 1240 and published notice that such filing was available for public review and comment.

4. The County's financial consultant, Ashpaugh & Sculco, CPAs, PLC ("A&S"), reviewed Comcast's 2008 Form 1240 and, on November 4, 2008, requested supporting information from Comcast. Comcast provided a letter response on November 18. On November 24, Comcast provided additional information, together with a recalculated Form 1240 that took into account the County's October 22, 2008, rate order establishing basic service tier ("BST") rates for 2008 (the "Prior Rate Order"). A&S prepared a letter report dated December 10, 2008 ("Initial A&S Report"), based on this revised Comcast filing.

5. On December 12, 2008, the County delivered to Comcast for comment a courtesy draft of this rate order, including the Initial A&S Report. Comcast submitted its comments on December 22, 2008, in the form of a letter from Joshua Bokee to Marjorie L. Williams ("Comcast Comments"), to which was attached another copy of Comcast's November 24 recalculated Form 1240. After



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

the Initial A&S Report was prepared, Comcast announced that it was making certain additional channel line-up changes. A&S revised its initial report to address Comcast's comments and the additional channel changes, and submitted a revised letter report dated May 28, 2009 ("May A&S Report"). The May A&S Report is appended hereto as Attachment 1. A&S subsequently revised the calculations in the Form 1240 attached to the May A&S Report to account for changes in the FCC's inflation factor. A revised Maximum Permitted Rate ("MPR") for the BST, calculated using the latest inflation factor, appears in the appendices to a letter report dated September 2, 2009 (the "September A&S Report"). The September A&S Report is appended hereto as Attachment 2.

6. The County also provided Comcast with a copy of the May A&S Report and a revised draft of this rate order. At Comcast's request, the County entered into discussions with Comcast regarding the May A&S Report and the revised draft, addressing principally the proper treatment of certain channels designated by Comcast as part of the BST, but made available to subscribers only in digital format. The County asserted that such channels should not be



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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considered part of the BST, whereas Comcast asserted that they should. The County and Comcast have reached a resolution of that issue, which has been memorialized in the form of a Rate Agreement. A&S has prepared a final report, dated September 14, 2009, which includes a further recalculation of Form 1240 adopting Comcast’s position regarding the digital channels, and making the other adjustments identified in the May A&S Report and September A&S Report (the “Final A&S Report”). The Final A&S Report is appended hereto as Attachment 3.

7. Federal Communications Commission (“FCC”) rules place the burden on the cable operator to prove that its rates for basic service and equipment are reasonable under applicable federal law and regulations. 47 C.F.R. § 76.937(a). The County has provided Comcast with ample opportunity to provide the necessary support for its rates. To the extent Comcast has failed to carry its burden of proof, the County may reject Comcast’s rates, set rates itself based on the best available information, and order refunds. *See, e.g., Comcast Cablevision*



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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of Tallahassee, Inc.: Appeal of Local Rate Order of City of Tallahassee, Fla., DA 95-1561, 10 FCC Rcd 7686 at ¶¶ 28-29, 37, 48-49, and 54 (1995).

8. Pursuant to FCC rules, the County is required to complete its review of the 2008 Form 1240 within twelve months of the filing date, provided that the deadline may be extended with the consent of the FCC. The FCC consented to two extensions of the deadline, the second extension being until October 23, 2009.

9. On October 8, 2009, the FCC released an order revoking the County's authority to regulate Comcast's rates (the "Effective Competition Order"). Nevertheless, notwithstanding the Effective Competition Order, the County believes that the County's authority regarding the MPR proposed in the 2008 Form 1240 remains unaltered, and in any event the Effective Competition Order does not alter the County's authority to regulate rates on behalf of certain municipalities within the County that fall outside the scope of the Effective Competition Order (the "Unaffected Municipalities").



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

II. FINDINGS AND CONCLUSIONS

10. For the reasons discussed below, the County believes that the May A&S Report, as modified by the September A&S Report, properly computes the MPR for the BST. Nevertheless, the County recognizes that the Rate Agreement offers certain benefits to the County and subscribers. Accordingly, the County adopts the rates established in the September A&S Report, but suspends the application of those rates, provided that the County reserves the right to reinstate those rates if Comcast does not comply with the terms of the Rate Agreement, as provided in the Rate Agreement.

11. With respect to Comcast's 2008 Form 1240, incorporating where appropriate the Comcast Comments, the May A&S Report concludes that certain adjustments are necessary in Comcast's Form 1240 pursuant to FCC regulations. In particular, the May A&S Report adjusts the programming costs and the franchise-related costs used in Comcast's calculation. May A&S Report at 3-4. The May A&S Report also adjusts the MPR to take into account the movement of



MONTGOMERY COUNTY EXECUTIVE ORDER

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Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

two channels from the BST. May A&S Report at 2-3. A&S has recalculated Comcast's FCC Form 1240 accordingly.

12. The Final A&S Report makes the same adjustments as the May A&S Report and the September A&S Report, except that it accepts Comcast's position regarding the treatment of digital channels assigned by Comcast to the BST.

A. Digital-Only Channels

13. During 2008, Comcast continued to move channels from the BST into digital-only form. May A&S Report at 2. This issue was addressed in the Prior Rate Order at ¶¶ 15-21.

14. In January 2008, Comcast began delivering two channels that were previously provided in analog form on the Basic Service Tier ("BST") solely as digital channels: TV Guide (analog channel 93 moved to digital channel 100) and a leased access channel (analog channel 95 moved to digital channel 190). May A&S Report at 2.



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

15. In addition, Comcast later made two other channel changes that affect the current basic rate. Effective January 1, 2009, Comcast moved TNT to the BST, and effective April 14, 2009, Comcast moved MPT-22 (PBS-Annapolis) from analog delivery to digital delivery. Although these changes took place after the historical period covered by 2008 Form 1240, moving these channels alters the number of channels for the "Projected Period" in Worksheet 5 of the Form 1240.

16. The May A&S Report makes adjustments to the MPR filed by Comcast based on Comcast's movement of these four channels (three from the BST and one to the BST). May A&S Report at 2.

17. The County believes that Comcast may not include digital channels in the basic tier price when some basic subscribers do not have equipment that will allow them to view those channels. In particular, basic-only subscribers using the type of equipment specifically designated as available for basic-only subscribers cannot view those channels, although they are paying for the channels as part of their basic rate. Such channels are not available on the same terms and



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

conditions, on the whole, as are the other channels on the BST. *See* Prior Rate Order at ¶¶ 16-20; *City of Dearborn v. Comcast of Michigan*, Case 2:08-cv-10156-VAR-DAS, Opinion and Order, slip op. at 8-9 (Jan. 14, 2008); Order, slip op. at 13-15 (Oct. 3, 2008).

18. Comcast's arguments with respect to digital-only channels in the Comcast Comments are largely the same as the arguments the County rejected in its preceding Form 1240 rate order. *See* Prior Rate Order at ¶¶ 19-21.

19. The Comcast Comments seek to buttress the company's earlier arguments by quoting from a December 2008 federal district court decision, *City of Petersburg, Florida v. Bright House Networks, LLC*, Case 8:07-cv-02105-SCB-TGW. Comcast Comments at 2-3. The *Bright House* case, however, is not relevant to the 2008 Form 1240 filed by Comcast with the County. The court in *Bright House* allowed the movement of PEG channels to digital-only form because (a) the FCC had already ruled that there was effective competition, and (b) Florida law expressly permitted such movement. *Bright House*, slip op. at 6, 8-9. Neither rationale applies here.



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

20. To the extent that dicta in *Bright House* express disagreement with the *City of Dearborn* case cited above, the County finds the reasoning of *Bright House* less compelling than that of the *Dearborn* case. Moreover, as noted in the Prior Rate Order at ¶ 20, statements from FCC staff indicate that the FCC is unlikely to accept Comcast's position.

21. In a footnote, Comcast suggests that its removal of channels from the basic tier should be partially offset by the "residual rate associated with each digitized channel" because Comcast later added a different channel, TNT, to the basic tier. Comcast Comments at 2 n.1. Comcast has not shown that the FCC's rules require leaving in the rate base any amount associated with the channels removed from the basic tier, particularly where, as here, the new channel was not placed on the basic tier until approximately a year after the digitized channels were removed. A&S does properly take into account the addition of TNT to the basic tier, pursuant to the FCC's rules. May A&S Report at 3.

22. The County finds that the adjustment made by A&S is reasonable and appropriate under FCC regulations.



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

B. Programming Costs

23. The May A&S Report makes certain adjustments to the programming costs filed by Comcast based on review of Comcast's supporting detail. May A&S Report at 3.

24. The County finds that the adjustment made by A&S is reasonable and appropriate under FCC regulations.

C. Franchise-Related Costs

25. Contrary to the County's agreement with the prior operator, Comcast has included interest for the True-up Period in Line 707 of that Worksheet 7.

26. The May A&S Report corrects this error. May A&S Report at 3-4.

27. If Comcast itemizes franchise-related costs on subscriber's bills, the amount that should be shown is the amount on Line 707 for the Projected Period divided by the projected number of subscribers (shown on Line B3 of Form 1240), divided by 12. This calculation results in a monthly per-subscriber cost of



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

\$1.87, which appears in Worksheet 7 of the revised FCC Form 1240 prepared by A&S and attached to the A&S Report as Appendix C. May A&S Report at 4.

28. The County finds that the adjustment made by A&S is reasonable and appropriate under FCC regulations.

D. Calculation Issues

29. After reviewing the A&S Report, Comcast Comments proposed corrections to A&S's recalculated Form 1240. One such correction was made to Module D, line D1, and a second to line 301 in Worksheet 3. Comcast Comments at 1 (first two bullet points). A&S concluded that these corrections were valid. They are included in A&S's further recalculated Form 1240, attached to the May A&S Report.

30. Based on the May A&S Report, the County finds that the corrections described in ¶ 27 are reasonable and appropriate under FCC regulations.

31. Comcast also suggested that data relating to franchise-related costs had been applied to the wrong time periods in the Initial A&S Report. Comcast



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

Comments at 1 (last two bullet points). A&S, however, concluded that Comcast had assigned these amounts to the wrong time periods, and that the original A&S Report was correct. Thus, the recalculation attached to the Final A&S Report uses the same data as in the Initial A&S Report with respect to these two points.

32. The County finds that the conclusions reached by A&S as described in ¶ 29 are reasonable and appropriate under FCC regulations.

E. Additional Information Regarding the TV Guide Channel

33. The Comcast Comments also provided new information regarding the timing of Comcast's movement of the TV Guide Channel to digital-only form. Comcast Comments at 4. The May A&S Report takes into account this new information, which has a relatively minor effect on the regulated rate.

F. Inflation Adjustment

34. Because it was necessary to recalculate Comcast's rates for the above reasons, A&S used the most current inflation data as of the time of the recalculation, pursuant to FCC rules. September A&S Report.



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

G. Conclusion

35. In light of the above discussion, the County finds the A&S adjustments to the Form 1240 calculations in the May A&S Report to be reasonable and appropriate, as modified by the inflation adjustment in the September A&S Report. Nevertheless, the County also finds that the terms of the Rate Agreement offer subscribers substantial benefits. The County's concern regarding Comcast's treatment of digital channels has been that Comcast should not include digital channels in the basic tier price when basic-only subscribers with basic-only equipment cannot view them. Basic-only subscribers using the type of equipment specifically designated as available for basic-only subscribers cannot view those channels, although they are paying for the channels as part of their basic rate. Comcast has asserted that it has the legal authority to treat such channels as part of the BST. Notwithstanding this disagreement, Comcast has agreed in the Rate Agreement to make certain equipment available to subscribers, at no charge or at reduced rates. The County believes that this approach addresses the County's concern that all BST subscribers have full access to the BST. In addition,



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

Comcast has agreed to make refunds to all subscribers in the amount of \$3.50.

The County believes that this resolution treats subscribers fairly, so long as

Comcast abides by all of its commitments in the Rate Agreement.

III. ORDERING CLAUSES

IT IS THEREFORE ORDERED THAT:

36. Comcast's maximum permitted rate for basic service (including the FCC regulatory fee) is hereby set at \$18.87, excluding the franchise fee and any add-on amount pursuant to Form 1235, but including all other franchise-related costs and the FCC regulatory fee, in accordance with the calculations and rationales of the Final A&S Report, the September A&S Report, and the attached recalculated FCC Form 1240. The rates set herein will govern Comcast's basic service rates in the Unaffected Municipalities until Comcast implements a further rate change pursuant to applicable law. The rates set herein will govern Comcast's basic service rates in the remaining portions of the County through December 31, 2009.



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

37. Notwithstanding the terms of Paragraph 36, the County hereby suspends the application of the MPR set in Paragraph 36 and any resulting refund obligation, and hereby sets the MPR and Comcast's refund obligation as provided in Paragraphs 38 and 39. The County reserves the right to reinstate the MPR set in Paragraph 36 and any resulting refund obligation, if the County determines that Comcast has not complied with the Rate Agreement, as provided in the Rate Agreement.

38. Except as provided in Paragraphs 36 and 37, Comcast's maximum permitted rate for basic service (including the FCC regulatory fee) is hereby set at \$20.88, excluding the franchise fee and any add-on amount pursuant to Form 1235, but including all other franchise-related costs and the FCC regulatory fee, in accordance with the calculations and rationales of the Final A&S Report and the attached recalculated FCC Form 1240. The rates set herein will govern Comcast's basic service rates in the Unaffected Municipalities until Comcast implements a further rate change pursuant to applicable law. The rates set herein will govern



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

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Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

Comcast's basic service rates in the remaining portions of the County through December 31, 2009.

39. Except as provided in Paragraph 37, Comcast shall refund to each subscriber the sum of \$3.50. Refunds shall be made as soon as possible, but in any event within sixty (60) days from the effective date of this Order.

40. Pursuant to ER § 5.2, Comcast shall file with the County within ninety (90) days from the date of this Order, a certification, signed by an authorized representative of Comcast, stating whether Comcast has complied fully with all provisions of this Order and describing in detail the precise measures taken to implement this Order.

41. Comcast shall not charge any BST rate higher than the applicable BST rate set herein, nor increase that rate, nor impose on subscribers any other charge for basic service not specified herein or in the County's previous rate orders, including but not limited to bulk and commercial rates (to the extent such limitation is permitted by applicable law), unless such charge is first filed with and approved by the County, in accordance with applicable law and regulations,



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

including but not limited to the notice requirements imposed by 47 C.F.R. § 76.1603(d), or as otherwise expressly permitted by applicable law and regulations.

42. Comcast may charge a rate less than the maximum rate indicated above for basic service, as long as such rate complies with applicable law and is applied in a uniform and nondiscriminatory manner, pursuant to federal, state, and local laws and regulations.

43. Pursuant to ER § 4.3, the applicable BST rate set herein is subject to further reduction and refund to the extent permitted under applicable law and regulations, as the same may be amended.

44. The findings herein are based on the representations of Comcast. Should information come to the County's attention that these representations were inaccurate in any material way, the County reserves the right to take appropriate action. This Order is not to be construed as a finding that the County has accepted as correct any specific entry, explanation or argument made by Comcast not specifically addressed herein.



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

45. The County reserves all of its rights with respect to rate regulation, including, but not limited to, any right it may have to reopen this rate proceeding based on new information or rulings by governing authority, if it appears that such new information or rulings could alter the reasonable rates prescribed by FCC regulations, pursuant to ER § 4.3, and any right it may have to “true up” overcharges or undercharges in connection with future rate filings pursuant to 47 C.F.R. § 76.922(e)(3).

46. None of the provisions of this Order, including the County’s reservation of rights expressly set forth herein, is intended to undermine the full force and effect of the Rate Agreement.

47. This Order constitutes the written decision required by 47 C.F.R. § 76.936(a).

48. To the extent that the Executive Regulation would impose deadlines or hearing requirements more stringent than those observed with respect to this process, and waiver of such requirements would be consistent with applicable



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

FCC regulations and would not cause substantial harm to any party, the County Executive hereby waives such requirements, pursuant to ER § 6.1(c).

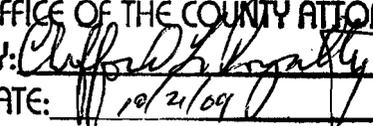
49. This Order shall be effective immediately upon its approval by the County Executive, pursuant to ER § 4.1.

50. This Order shall be released to the public and to Comcast, and a public notice shall be published stating that this Order has been issued and is available for review, pursuant to ER § 4.1 and 47 C.F.R. § 76.936(b).


Isiah Leggett
County Executive

Oct 22, 2009
Date

APPROVED AS TO FORM AND LEGALITY
OFFICE OF THE COUNTY ATTORNEY

BY: 
DATE: 10/21/09

RATE AGREEMENT

THIS RATE AGREEMENT ("Agreement") is entered into by and between Montgomery County, Maryland ("County"), and Comcast of Potomac, LLC ("Comcast").

WHEREAS, Comcast of Potomac, LLC, a Delaware limited liability corporation, owns, operates and maintains a cable system in the County; and

WHEREAS, pursuant to federal law, the County regulates certain subscriber rates charged by Comcast in the County, including the basic service tier ("BST"); and

WHEREAS, Comcast filed FCC Form 1240 (among other forms) with the County on October 1, 2008 (the "Rate Filing"); and

WHEREAS, the Rate Filing proposed a maximum permitted rate ("MPR") for the BST, to take effect on January 1, 2009; and

WHEREAS, the County has reviewed the Rate Filing and disagrees with Comcast's proposed MPR; and

WHEREAS, on October 8, 2009, the FCC released an order revoking the County's authority to regulate the BST rate (the "Effective Competition Order"); and

WHEREAS, notwithstanding the Effective Competition Order, the County believes that the County's authority regarding the MPR proposed in the Rate Filing remains unaltered, and in any event the Effective Competition Order does not alter the County's authority to regulate rates on behalf of certain municipalities within the County that fall outside the scope of the Effective Competition Order (the "Unaffected Municipalities"); and

WHEREAS, Comcast disagrees with various positions taken by the County regarding the Rate Filing and the Effective Competition Order; and

WHEREAS, the parties agree it is in the best interest of both parties, and the public, to resolve this dispute through a stipulation;

NOW, THEREFORE, in consideration of the terms and conditions set forth herein, the promises and undertakings herein, and other good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, THE SIGNATORIES DO HEREBY AGREE AS FOLLOWS:

1. TERMS

(a) Maximum Permitted Rate for the Basic Service Tier.

(1) The MPR for the BST for January 1, 2009, through December 31, 2009, shall be \$20.88, exclusive of all franchise fees. The County shall adopt a rate order in substantially the form of Exhibit 1 (the "Rate Order"), setting the MPR at the amount provided herein.

(2) The methodology underlying the MPR calculation described in subsection (a)(1) above allows Comcast to claim rate credit for digital channels that are offered to basic subscribers at no additional service fee as part of a hybrid analog/digital basic service. Comcast shall be permitted to follow this same methodology in its BST rate filing for the January 1, 2010, through December 31, 2010, period, as well as the January 1, 2011 through December 31, 2011, period (the "Prospective Period"), with respect to the MPR in the Unaffected Municipalities and in any other rate regulated communities within the County.

(3) The Prospective Period roughly corresponds to the time period during which Comcast shall offer equipment according to subsections (b)(1) and (b)(2) below. Comcast shall have the option of extending its authority to proceed under the rate methodology described in subsection (a)(2) above for an additional year. To do so, Comcast shall notify the

County of its decision to exercise this extension option on or before October 1, 2011, and shall notify all BST customers in any community in the County still subject to rate regulation that the offers set forth in subsections (b)(1) and (b)(2) below are extended automatically for an additional twelve (12) month period.

(4) Except as otherwise expressly stated in this Agreement, this Agreement shall not be interpreted to bind either party, or to waive either party's rights, with respect to the correct interpretation of the FCC's rules for purposes of any future rate proceeding.

(b) Digital Equipment Offers.

(1) Comcast shall offer those cable subscribers who subscribe only to the BST, a Digital Basic Only converter box, at no additional charge, for a period of twenty-four months, beginning on the date each such subscriber receives the converter box. This offer will remain open to all BST-only subscribers through September 30, 2010. Equipment shall be provided to a subscriber within fifteen (15) days of a request.

(2) Comcast shall also offer those cable subscribers who subscribe only to the BST, additional Digital Basic Only converter boxes, at a rate of \$1.10 per converter per month, for a period of twenty-four months, beginning on the date each such subscriber receives the converter boxes. This offer will remain open to all BST-only subscribers through September 30, 2010. Equipment shall be provided to a subscriber within fifteen (15) days of a request.

(3) Comcast shall offer all cable subscribers who subscribe to Standard Service, and no additional digital service, one Digital Addressable converter box and two Digital Transition Adapters ("DTAs"), at no additional charge for a period of twelve months, beginning on the date each such subscriber receives the equipment. This offer will remain open

to all Standard Service (i.e., non-digital, non-BST-only) subscribers through September 30, 2010. Equipment shall be provided to a subscriber within fifteen (15) days of a request.

(4) Comcast shall offer all subscribers who subscribe to the Family Tier and the Economy Video Package, two additional Digital Addressable converter boxes, at a rate of \$1.10 per converter per month, for a period of twelve months, beginning on the date each such subscriber receives the converter box(es). This offer will remain open to such subscribers through September 30, 2010. Equipment shall be provided to a subscriber within fifteen (15) days of a request.

(5) Comcast shall offer all cable subscribers who subscribe to a digital offering beyond Standard Service (and excluding Family and Economy Video subscribers addressed in subsection (b)(4) above), two DTAs at no additional charge for a period of twelve months, beginning on the date each such subscriber receives equipment. This offer will remain open to such subscribers through September 30, 2010. Equipment shall be provided to a subscriber within fifteen (15) days of a request.

(6) Comcast shall actively promote the availability of the digital equipment to be made available in Paragraphs (1)-(5) above (the "Digital Equipment Offers") using a diverse set of marketing tactics. Specifically, Comcast shall take the following steps: (i) inform all BST-only subscribers in writing, on two separate occasions, by U.S. mail, of the Digital Equipment Offers in accordance with the following timeline: a) within 60 days after the effective date of this Agreement; and b) via a second mailing to occur any time between February and April of 2010; (ii) promote the Digital Equipment Offers using a diverse set of tactics, such as a bill message, newspaper advertisement or a cross-channel ad insertion; (iii) inform all new subscribers of the Digital Equipment Offers; (iv) summarize all of the Digital

Equipment offers in an insert to be included with Comcast's Annual Rate Card distribution to subscribers in late 2009; (v) ensure that all customer care representatives ("CAE's") serving the County are made aware of and given complete and accurate information regarding the terms of the Digital Equipment Offers, and instructed to make subscribers aware of the Digital Equipment Offers; and (vi) provide the County with an opportunity to review and comment on a draft script prepared by Comcast for use by CAE's in communicating with subscribers regarding the Digital Equipment Offers, with Comcast making a good faith effort to accommodate County concerns.

(7) The terms "Standard Service," "Family Tier," and "Economy Video Package" shall refer to the packages or tiers of service with those names as of the date of this Agreement. If Comcast changes the composition or names of any of these tiers or packages after the date of this Agreement, such terms shall refer to the closest comparable tier or package then offered by Comcast in the County.

(c) **Appeal of the County's Rate Order.** If the County issues a rate order regarding the Rate Filing in substantially the form attached hereto as Exhibit 1 (the "Rate Order"), Comcast shall not appeal that rate order.

(d) **2008 Refunds.**

(1) Comcast shall refund to all cable subscribers the sum of \$3.50.

(2) The refund may take the form of a credit. All refunds or credits shall be issued and appear on subscribers' bills no later than sixty days (60) after the effective date of the Rate Order. Pursuant to ER § 5.2, Comcast shall file with the County within ninety (90) days from the date of the Rate Order a certification, signed by an authorized representative of

Comcast, stating whether Comcast has complied fully with all provisions of the Rate Order, describing in detail the precise measures taken to implement the Rate Order.

(3) This Agreement shall not be construed to prevent the County from requiring refunds pursuant to FCC regulations with respect to any rates other than those proposed by Comcast in the Rate Filing.

(e) **Disputes Regarding This Agreement.** The parties agree that this Agreement was developed as a reasonable resolution of disputes with respect to rates, compliant with applicable law and regulations. The parties waive any claim that this Agreement is not in conformance with FCC regulations. Neither Comcast nor any of its affiliates, nor the County, shall file any claim or raise a defense that challenges any provision of this specific Agreement as being contrary to the Cable Communications Policy Act of 1984, 47 U.S.C., §§521, *et seq.*, as amended by the Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-385, 106 Stat. 1460 (1992), and by the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996), or to FCC regulations; nor will they participate with any other person or entity in any such challenge.

(f) **Effect of Rate Stipulation.** Comcast and County agree that the purpose of this Agreement is solely to resolve the dispute between them regarding the calculation of Comcast's regulated MPR for the BST and that this Agreement does not constitute an admission of wrongdoing on the part of either party.

(g) **Reservation of Rights.**

(1) The County reserves the right to review the prospective treatment of digital channels in a hybrid analog/digital BST at the end of the time periods set forth in Section 1(a), subject to the scope of applicable rate regulation authority in existence at that time. In no

event, however, shall the County's review require Comcast to "true-up" or refund any past "overcharges" that would have resulted had the County excluded digital channels from calculation of the BST MPR in any historic or projected period encompassed by the rate filings contemplated in Section 1(a). The County also reserves all of its rights with respect to the review of any rate filing for any period prior to the time periods set forth in Section 1(a), except that the treatment of digital channels in a hybrid analog/digital BST shall be governed by this Agreement.

(2) Comcast retains full rights to adjust its BST rates in rate deregulated communities, notwithstanding any provision of the Rate Order or this Agreement to the contrary. In particular, no provision of the Rate Order or this Agreement establishing the maximum permitted rate for the BST is intended to extend the County's authority to regulate rates beyond the scope of the FCC's rules. Deregulation of the BST, however, shall have no effect on Comcast's obligation to make the refunds required by Section 1(d) or to comply with the Digital Equipment Offers and the other obligations of Section 1(b), and Comcast shall honor those obligations notwithstanding the regulatory status of its local operations.

(h) Enforcement.

(1) In the event that Comcast fails to make the refunds required by section 1(d)(1), the County shall provide Comcast with written notice of such failure and a thirty (30) day cure period. If Comcast fails to implement the required refund during that period (or take reasonable steps towards implementing the refund if it cannot be reasonably accomplished within that timeframe), the County reserves the right to reinstate the MPR set in paragraph 36 of the Rate Order, as described in the Rate Order, and to take other appropriate, lawful steps to enforce this Agreement.

(2) In the event that Comcast fails, in a material respect, to implement the Digital Equipment Offers, the County shall provide Comcast with written notice of such failure and a thirty (30) day cure period. If the County reasonably determines that Comcast has failed to implement the Digital Equipment Offers, in a material respect, during that period, the County reserves the right to reinstate the MPR set in paragraph 36 of the Rate Order, as described in the Rate Order, and to take other appropriate, lawful steps to enforce this Agreement.

(3) In the event the County reinstates paragraph 34 of the Rate Order for any reason, Comcast shall have the right to appeal such reinstatement to the FCC, as if the reinstatement constituted a newly adopted rate Order, notwithstanding Comcast otherwise forfeiting the right of appeal under Section 1(c).

(4) If Comcast fails to comply with the terms of this Agreement with respect to the issues described below, the County shall be entitled to receive liquidated damages, as follows:

(i) For failure to comply with any of the terms of the Digital Equipment Offers as they pertain to a specific individual subscriber, such as, without limitation, by failing to provide equipment within fifteen (15) days of a request, or by billing a subscriber for equipment that is required to be provided at no additional charge: \$10.00 per day for each affected customer, with a \$50.00 individual cap, and a \$10,000 aggregate cap for all failures subject to the subsection, provided that Comcast shall have fifteen (15) days written notice and opportunity to cure; and

(ii) For failure to implement and comply, in a material respect, with the terms of the marketing program required by paragraph 1(b)(6): \$500 per day, with a \$30,000 aggregate cap for all failures subject to this subsection, provided that Comcast shall

have thirty (30) days written notice and opportunity to cure.

The County may draw on the Security Fund provided for in the Franchise Agreement to collect such liquidated damages. If Comcast fails to correct any noncompliance within the prescribed cure period, liquidated damages shall be computed beginning on the date on which written notice of the violation was first provided to Comcast.

2. REPRESENTATIONS AND WARRANTIES

(a) **Authority.** Each person executing this Agreement on behalf of a corporation or other legal entity warrants and represents that he or she holds the position indicated beneath his or her signature and that he or she has been duly authorized by said corporation or other legal entity to execute this Agreement on its behalf. Each party warrants and represents that this Agreement is a valid, binding and enforceable obligation of that party and does not violate any law, rule, regulation, contract or agreement applying to that party.

(b) **Advice of Counsel.** Each party to this Agreement acknowledges and agrees that such party has been represented throughout the negotiation and documentation of this Agreement by attorneys of the party's choice and has been advised by such attorneys with respect to this Agreement. Each party to this Agreement further acknowledges and agrees that such party has read this Agreement, knows the contents of this Agreement and, in executing this Agreement, has relied solely on the party's own judgment, belief and knowledge, and the advice and recommendations of the party's attorneys concerning this Agreement, and has not been induced to enter into this Agreement by any representation or statement of any other party not expressly contained in this Agreement.

3. MISCELLANEOUS

(a) **Assignment.** This Agreement is binding upon and shall inure to the benefit of the parties and their respective successors and assigns. Neither party may assign its rights or obligations hereunder without the prior written consent of the other party.

(b) **Severability.** If any provision of this Agreement is held to be invalid or unenforceable to any extent, the remainder of this Agreement shall be valid in all other respects and continue to be effective.

(c) **Integration.** This Agreement sets forth the entire agreement between the parties relating to the subject matter of this Agreement. All agreements, covenants, representations and warranties, express or implied, oral or written, of the parties with regard to the subject matter hereof are contained in this Agreement and the documents referred to herein. No other agreements, covenants, representations or warranties, express or implied, oral or written, have been made by any party to any other party with respect to the subject matter of this Agreement. All prior and contemporaneous conversations, negotiations, possible and alleged agreements, representations, covenants and warranties with respect to the subject matter hereof are waived, merged in this Agreement and superseded by it.

(d) **Captions.** The captions and headings of this Agreement are for convenience and reference purposes only, and shall not affect in any way the meaning and interpretation of any provisions of this Agreement.

(e) **Time of the Essence.** In determining whether a party has complied with this Agreement, the parties agree that time is of the essence.

(f) **Governing Law.** This Agreement shall be governed in all respects by the law of Maryland.

(g) **Amendment.** This Agreement may not be amended except by written agreement signed by both parties.

(h) **Counterparts.** This Agreement may be executed in any number of copies by the parties to this Agreement on separate counterparts, and all separate counterparts shall constitute the same Agreement.

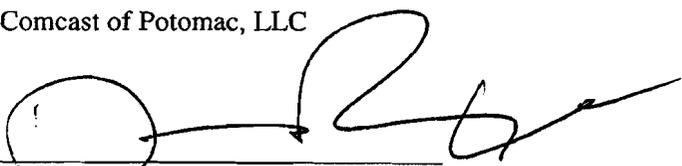
(i) **Effective Date.** This Agreement shall be effective upon execution of the Agreement by the County and Comcast.

AGREED TO THIS 22 DAY OF October, 2009.

Montgomery County, Maryland

By: 
Isiah Leggett
County Executive

Comcast of Potomac, LLC

By: 
Donna Rattley Washington
Vice President, Government Affairs DC Metro

APPROVED AS TO FORM AND LEGALITY
OFFICE OF THE COUNTY ATTORNEY
BY: 
DATE: 10/22/09



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date 10/22/09

ATTACHMENT 1:
MAY 28, 2009, REPORT OF ASHPAUGH & SCULCO, CPAs, PLC



ASHPAUGH & SCULCO, CPAs, PLC
Certified Public Accountants and Consultants

May 28, 2009

AS1011-15

Nicholas P. Miller, Esquire
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Avenue, N.W.
Suite 1000
Washington, DC 20036-4306

**SUBJECT: Review of the FCC Form 1240 of Comcast of Maryland, Inc. Filed with
Montgomery County, Maryland on or about October 1, 2008**

Dear Mr. Miller:

Ashpaugh & Sculco, CPAs, PLC ("A&S") were requested to assist Montgomery County, Maryland (the "County") with the review of the FCC Form 1240 filed by Comcast of Maryland, Inc. ("Comcast") on or about October 1, 2008. The County submitted its initial request for information to Comcast November 4, 2008. Comcast responded by letters of November 18 and 24, 2008. The November 24 response included an amended FCC Form 1240. This report and the following comments are addressed to that amended 1240, which will be referred to as Comcast's FCC Form 1240.

A&S reviewed and analyzed Comcast's supporting data and its responses and then recalculated Comcast's FCC Form 1240. This report discusses our findings and our recommended changes based on the issues we have identified in Comcast's FCC Form 1240 and the supporting information. Attached to this letter report are:

- Appendix A - identifies the Basic Service Tier rate determined and recommended by A&S from our review of the filing;
- Appendix B - comparison of the recommended Basic Service Tier rate with the rate proposed by Comcast and the rate in effect at the time of the filing;
- Appendix C - A&S's recalculation of Comcast's FCC Form 1240;
- Appendix D - A&S's determination of programming costs;
- Appendix E - A&S's determination of franchise-related costs; and,
- Appendix F - A&S's determination of interest on franchise-related costs.

SUMMARY

Our review of Comcast's filed FCC Form 1240 identified several areas of concern. As addressed in our review of Comcast's prior 1240 filing of October 1, 2007, Comcast has continued to change Basic Service Tier channels to digital. During the period covered by the 2008 1240, Comcast has changed three additional channels from analog to digital. Our recalculation of the 1240 has made

adjustments to the 1240 due to this. Consistent with the treatment in prior years, we recalculated programming cost of Comcast for the True-Up Period and the Projected Period (Appendix D) and Franchise-Related Costs and the associated interest (Appendices E and F). These changes, which will be discussed in detail below, impact the Maximum Permitted Rate ("MPR"), Line I9 of the 1240. Our changes decrease the MPR of Comcast's FCC Form 1240 from the filed amount of \$20.6497 to \$18.5866.¹ Including the 5.0% franchise fee, A&S's maximum rate for the Basic Service Tier is \$19.56.

FCC FORM 1240

The first step in our review was to input the FCC Form filed by Comcast with the County into the FCC spreadsheet model to generate copies of the FCC's form. With this spreadsheet package, we were able to duplicate Comcast's filing and the resulting rate. Comcast corrected the initial filing to use the County's approved 2007 FCC Form 1240 as its starting document for the amounts in the amended 2008 FCC Form 1240.

INFLATION FACTOR

Comcast's amended filing used the latest figures at that time of 1.11% that was released by the FCC on October 9, 2008. Since then the FCC has released its 4th Quarter 2008 Inflation Factor of 0.55% on April 2, 2009. As required by the FCC's rules related to cable rate regulation, A&S has refreshed the inflation factor to this latest figure.

CHANNEL COUNT AND MOVEMENT

In September 2006 Comcast began delivering two channels on the Basic Service Tier ("BST"), WNVC-MHz2 and WNVT-MHz, solely as digital channels. Basic-only subscribers that do not have a digital cable-ready television are not able to view these channels. This situation was addressed in our analysis of the 2007 filing and subsequently approved by the County in its October 2008 rate order.

In the instant filing Comcast has identified two additional channels, TV Guide (analog channel 95 to digital channel 100) and Leased (analog channel 95 to digital channel 190), that it is moving from analog to digital. These changes were made in January 2008. This means that the subscriber must have a digital converter or another type of equipment to see these channels. These channels cannot be seen by a television without the purchase, lease or rental of additional equipment. This also has the effect of reducing the number of channels on the BST. Comcast has in effect increased the rate for the BST since it has reduced the number of channels that can be viewed.

Comcast failed to address the movement of these 2 additional channels in its amended 1240 even though it used the County's approved 2007 Form 1240 for basis for the amended filing. Comcast also failed to acknowledge in its filed 1240 that it was making further changes effective April 14,

¹ The MPR as determined by A&S includes the pass-through of the FCC Regulatory Fee (annual amounts of \$.75 per subscriber for the True-Up Period and \$.83 per subscriber for the Projected Period). Comcast separately itemizes this fee on the subscriber's bill. The MPR also includes \$1.87 of Franchise-Related Costs, as shown on Worksheet 7 of our 1240, Appendix C (\$1.96 including franchise fees). Comcast incorrectly identifies and itemizes this amount as "PEG" on the subscriber's bill in the amount of \$1.50.

Nicholas P. Miller, Esquire
May 28, 2009
Page 3 of 4

2009. On this date Comcast moved MPT-22 (PBS Annapolis) from analog to digital. As discussed above, this further reduces the number of channels on the BST.

Consistent with our treatment in the prior filing, A&S has decreased the number of BST channels by 3. As shown on Worksheets 5 of the 1240, 2 channels were removed in January 2008 of the True-up Period and 1 channel was removed in April 2009 of the Projected Period. These changes reduce the number of BST channels and reduces the Maximum Permitted Rate ("MPR") determined in our recalculated 2008 Form 1240.

PROGRAMMING EXPENSE

Pages 1 and 2 of Appendix D show our determination of programming expenses for the True-Up Period and the Projected Period.² In response to the information request, Comcast provided supporting detail for programming costs for the True-Up Period. In response to follow-up requests after filing the amended 1240, Comcast also provided certification of the projected rate for the addition of the channel TNT to the Basic Service Tier.

Our analysis recalculates programming costs and reduces Comcast's determination of programming costs for the True-Up Period and the Projected Periods. Comcast's supporting information shows that for its 2008 filing it failed to account for discounts in programming costs related to bad debts. We have corrected this in our analysis. In addition, Comcast has included per subscriber programming costs for the TV Guide channel, which, as discussed above, was changed to a digital channel in January 2008. However, the supporting information shows the cost for the TV Guide channel for the period July 2007 through December 2007 was based on the number of digital subscribers, not on the number of BST subscribers. Digital subscribers are about 70% to 75% of BST subscribers. Comcast erred by including programming cost for the TV Guide channel in the 1240 based on the number of all BST subscribers, rather than only on the number of digital subscribers. A&S has corrected this for July 2007 through December 2007. A&S also excluded TV Guide programming costs for January 2008 through June 2008 and for the Projected Period since the TV Guide channel was changed to digital in January 2008. This reduces the programming cost included in Worksheet 7 for the True-Up Period by \$.0630 per subscriber and \$.2044 per subscriber for the Projected Period.

FRANCHISE-RELATED COSTS

Franchise-related costs ("FRC") are identified in the Form 1240 at Line 707 of Worksheet 7, Projected Period. These amounts are supported by Appendices E and F. Consistent with the agreement in 1999 with the then current operator, Prime Communications, Comcast's filing and our analysis have included carrying costs (interest) at 7.0% per year on the amortizable amounts. While we have included the interest in Line 707 for the Projected Period, we have input the interest for the True-Up Period on Line H12 to prevent the compounding of additional interest in the Form 1240 at 11.25%. Comcast has included interest on Line H12 in its amended 1240. However, it used the

² Comcast has requested that the specific cost information related to each channel be treated as confidential. For this reason, only the total cost is shown in our supporting documents. (See Appendix D Line 11 for the amount for the True-Up Period and Line 12 for the amount for the Projected Period.) Should Comcast challenge our calculations and it become necessary to provide this detail, we will provide a confidential version of this Appendix.

Nicholas P. Miller, Esquire
May 28, 2009
Page 4 of 4

interest associated with the Projected Period on Line H12 instead of the amount for the True-Up Period. Comcast then used the interest for the True-Up Period in determining the amount of Franchise-Related costs for Line 707 of the Projected Period Worksheet 7. Our analysis supports the amounts shown in our 1240 and reconciles to the support provided by Comcast. Comcast has since recognized it inverted these amounts.

To calculate the amount of FRC per subscriber per month included in the MPR, one would need to take the amount on Line 707 for the Projected Period divided by the projected number of subscribers (shown on Line B3 of the 1240) divided by 12. This calculation results in a monthly per subscriber cost of \$1.87 as shown at the bottom of Worksheet 7 Projected Period. If Comcast itemizes FRC on subscriber's bills, this is the amount that should be shown.

CONCLUSION

As indicated above, the resulting MPR with our changes is \$18.5866, which rounds to \$18.59. This MPR includes the amount for Franchise-Related Costs and the pass through of the FCC Regulatory Fee. We recommend the County: (i) reject the filings of Comcast; (ii) adopt A&S's 1240, which is attached as Appendix C to this letter report; (iii) approve the MPR of \$18.5866³ as recalculated by A&S and (iv) order Comcast to provide refunds, if necessary. In the order, the County should state that if any information should become known in the future which would impact these rates, the County may revisit this decision. The County should further state that (1) this amount includes the FCC Regulatory Fee and (2) this is the maximum rate allowed for the Basic Service Tier under the FCC's rules. If you have any questions or require any further information, please let me know.

Very truly yours,

ASHPAUGH & SCULCO, CPAs, PLC



Garth T. Ashpaugh, CPA
President and Member

Cc: Marjorie L. Williams, Program Manager, Department of Technology Services,
Office of Cable and Communication Services, Montgomery County, Maryland

Enclosure

2008 1240 Report

³ This amount does not include the Network Upgrade Add-on amount of \$.19 per subscriber per month from the FCC Form 1235 referenced by Comcast on Exhibit II of its November 24, 2008 amended FCC Form 1240 filing.

APPENDIX A

MONTGOMERY COUNTY, MARYLAND
 COMCAST OF MARYLAND, INC.
 REVIEW OF 2008 FCC FORM 1240
 RECOMMENDED MAXIMUM PERMITTED RATE

Line No.	Type of Service	Maximum Permitted Rate Recommended For Approval	Franchise Fees	Recommended Rates Including Franchise Fees of 5.00%
1	<u>Monthly Rate</u> Maximum Permitted Rate - Basic Tier [A]	\$18.59	\$0.98	\$19.56

[A] The rate shown includes franchise-related costs of \$1.87 per subscriber excluding franchise fees (\$1.96 including franchise fees). Comcast identifies and itemizes an amount of \$1.50 for this on the subscriber's bill.

APPENDIX B

MONTGOMERY COUNTY, MARYLAND
COMCAST CABLEVISION OF POTOMAC, LLC
REVIEW OF 2008 FCC FORM 1240
COMPARISON OF CURRENT, COMCAST FILED & PROPOSED MAXIMUM PERMITTED RATES

Line No.	Type of Service	Rates Excluding Franchise Fees							Rates Including Franchise Fees of 5%						
		Current Rates [B]	Maximum Permitted Rated ("MPR") Rate Filed 10/1/2008	Operator Selected Rated ("OSR") Rate Filed 10/1/2008	A&S Determined Maximum Permitted Rate	Difference A&S & Current Rates [d-a]	Difference A&S & MPR Rates [d-b]	Difference A&S & OSR Rates [d-c]	Current Rates [B]	Maximum Permitted Rated ("MPR") Rate Filed 10/1/2008	Operator Selected Rated ("OSR") Rate Filed 10/1/2008	A&S Determined Maximum Permitted Rate	Difference A&S & Current Rates [k-h]	Difference A&S & MPR Rates [k-i]	Difference A&S & OSR Rates [k-j]
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)
1	<u>Monthly Rate</u> Basic Tier [A] Percentage Change	\$19.31	\$20.65	\$19.31	\$18.59	(\$0.72)	(\$2.06)	(\$0.72)	\$20.33	\$21.74	\$20.33	\$19.56	(\$0.76)	(\$2.17)	(\$0.76)
						-3.75%	-9.99%	-3.75%					-3.75%	-9.99%	-3.75%

[A] Including the FCC Regulatory Fee and franchise-related costs, referred to by Comcast as the PEG fee.

[B] Comcast increased the BST rate effective March 1, 2008.

APPENDIX C

**FCC FORM 1240 DRAFT
UPDATING MAXIMUM PERMITTED RATES FOR REGULATED CABLE SERVICES**

Cable Operator:

Name of Cable Operator COMCAST OF POTOMAC, LLC		
Mailing Address of Cable Operator 20 WEST GUDE		
City ROCKVILLE	State MD	ZIP Code 20850

1. Does this filing involve a single franchise authority and a single community unit? YES NO

		X
--	--	----------

If yes, complete the franchise authority information below and enter the associated CUID number here:

2. Does this filing involve a single franchise authority but multiple community units? YES NO

X		
----------	--	--

If yes, enter the associated CUIDs below and complete the franchise authority information at the bottom of this page:

MD0057, MD0222, MD0223, MD0224, MD0225, MD0226, MD0227, MD0228, MD0229, MD0230, MD0231, MD0233, MD0234, MD0235, MD0236, MD0274, MD0275, MD0276, MD0277, MD0340, MD0341, MD0342, MD0343, MD0344, MD0345, MD0346, MD0347, MD0348 and MD0349
--

3. Does this filing involve multiple franchise authorities? **NO**

If yes, attach a separate sheet for each franchise authority and include the following franchise authority information with its associated CUID(s):

Franchise Authority Information:

Name of Local Franchising Authority MONTGOMERY COUNTY CABLE OFFICE		
Mailing Address of Local Franchising Authority 100 MARYLAND AVENUE, 3RD FLOOR		
City ROCKVILLE	State MD	ZIP Code 20850
Telephone number (240) 777-3636	Fax Number (240) 777-3770	

4. For what purpose is this Form 1240 being filed? Please put an "X" in the appropriate box.

a. Original Form 1240 for Basic Tier	
b. Amended Form 1240 for Basic Tier	X
c. Original Form 1240 for CPS Tier	
d. Amended Form 1240 for CPS Tier	

5. Indicate the one year time period for which you are setting rates (the Projected Period). TO

01/01/09	12/31/09	
-----------------	-----------------	--

(mm/yy)

6. Indicate the time period for which you are performing a true-up. TO

07/01/07	06/30/08	
-----------------	-----------------	--

(mm/yy)

7. Status of Previous Filing of FCC Form 1240 (enter an "x" in the appropriate box)

	YES	NO
a. Is this the first FCC Form 1240 filed in any jurisdiction?		X
b. Has an FCC Form 1240 been filed previously with the FCC?	X	

If yes, enter the date of the most recent filing: **11/20/98** (mm/dd/yy)

	YES	NO
c. Has an FCC Form 1240 been filed previously with the Franchising Authority?	X	

If yes, enter the date of the most recent filing: **10/01/07** (mm/dd/yy)

8. Status of Previous Filing of FCC Form 1210 (enter an "x" in the appropriate box)

a. Has an FCC Form 1210 been previously filed with the FCC?

YES	NO
X	

 If yes, enter the date of the most recent filing:

10/02/95	(mm/dd/yy)
----------	------------

b. Has an FCC Form 1210 been previously filed with the Franchising Authority?

YES	NO
X	

 If yes, enter the date of the most recent filing:

10/02/95	(mm/dd/yy)
----------	------------

9. Status of FCC Form 1200 Filing (enter an "x" in the appropriate box)

a. Has an FCC Form 1200 been previously filed with the FCC?

YES	NO
X	

 If yes, enter the date filed:

09/06/94	(mm/dd/yy)
----------	------------

b. Has an FCC Form 1200 been previously filed with the Franchising Authority?

YES	NO
X	

 If yes, enter the date filed:

09/06/94	(mm/dd/yy)
----------	------------

10. Cable Programming Services Complaint Status (enter an "x" in the appropriate box)

a. Is this form being filed in response to an FCC Form 329 complaint?

YES	NO
	X

 If yes, enter the date of the complaint:

(mm/dd/yy)

11. Is FCC Form 1205 Being Included With This Filing

YES	NO
X	

12. Selection of "Going Forward" Channel Addition Methodology (enter an "x" in the appropriate box)

Check here if you are using the original rules [MARKUP METHOD].
 Check here if you are using the new, alternative rules [CAPS METHOD].

If using the CAPS METHOD, have you elected to revise recovery for channels added during the period May 15, 1994 to Dec. 31, 1994?

YES	NO
	X

13. Headend Upgrade Methodology

*NOTE: Operators must certify to the Commission their eligibility to use this upgrade methodology and attach an equipment list and depreciation schedule.

Check here if you are a qualifying small system using the streamlined headend upgrade methodology.

Part I: Preliminary Information

Module A: Maximum Permitted Rate From Previous Filing

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
A1	Current Maximum Permitted Rate	\$19.3858				

Module B: Subscribership

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
B1	Average Subscribership For True-Up Period 1	188,198				
B2	Average Subscribership For True-Up Period 2					
B3	Estimated Average Subscribership For Projected Period	188,198				

Module C: Inflation Information

Line	Line Description				
C1	Unclaimed Inflation: Operator Switching From 1210 To 1240				1.0000
C2	Unclaimed Inflation: Unregulated Operator Responding to Rate Complaint				1.0000
C3	Inflation Factor For True-Up Period 1 [Wks 1]				1.0182
C4	Inflation Factor For True-Up Period 2 [Wks 1]				
C5	Current FCC Inflation Factor				1.0055

Module D: Calculating the Base Rate

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
D1	Current Headend Upgrade Segment					
D2	Current External Costs Segment	\$2.9739				
D3	Current Caps Method Segment					
D4	Current Markup Method Segment	\$0.0700				
D5	Current Channel Movement and Deletion Segment	(\$2.0267)				
D6	Current True-Up Segment	\$1.7005				
D7	Current Inflation Segment	\$0.3518				
D8	Base Rate [A1-D1-D2-D3-D4-D5-D6-D7]	\$16.3162				

**Part II: True-Up Period
Module E: Timing Information**

Line	Line Description		
E1	What Type of True-Up Is Being Performed? (Answer "1", "2", or "3". See Instructions for a description of these types.) If "1", go to Module I. If "2", answer E2 and E3. If "3", answer E2, E3, E4, and E5.		2
E2	Number of Months in the True-Up Period 1		12
E3	Number of Months between the end of True-Up Period 1 and the end of the most recent Projected Period		6
E4	Number of Months in True-Up Period 2 Eligible for Interest		0
E5	Number of Months True-Up Period 2 Ineligible for Interest		0

Module F: Maximum Permitted Rate For True-Up Period 1

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
F1	Caps Method Segment For True-Up Period 1 [Wks 2]					
F2	Markup Method Segment For True-Up Period 1 [Wks 3]	\$0.0700				
F3	Chan Mvmnt Deletn Segment For True-Up Period 1 [Wks' 4/5]	(\$2.524)				
F4	True-Up Period 1 Rate Eligible For Inflation [D8+F1+F2+F3]	\$13.8622				
F5	Inflation Segment for True-Up Period 1 [(F4*C3)-F4]	\$0.2519				
F6	Headend Upgrade Segment For True-Up Period 1 [Wks 6]					
F7	External Costs Segment For True-Up Period 1 [Wks 7]	\$3.1147				
F8	True-Up Segment For True-Up Period 1	\$1.8671				
F9	Max Perm Rate for True-Up Period 1 [F4+F5+F6+F7+F8]	\$19.0959				

Module G: Maximum Permitted Rate For True-Up Period 2

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
G1	Caps Method Segment For True-Up Period 2 [Wks 2]					
G2	Markup Method Segment For True-Up Period 2 [Wks 3]					
G3	Chan Mvmnt Deletn Segment For True-Up Period 2 [Wks' 4/5]					
G4	TU Period 2 Rate Eligible For Inflation [D8+F5+G1+G2+G3]					
G5	Inflation Segment for True-Up Period 2 [(G4*C4)-G4]					
G6	Headend Upgrade Segment For True-Up Period 2 [Wks 6]					
G7	External Costs Segment For True-Up Period 2 [Wks 7]					
G8	True-Up Segment For True-Up Period 2					
G9	Max Perm Rate for True-Up Period 2 [G4+G5+G6+G7+G8]					

Module H: True-Up Adjustment Calculation

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Adjustment For True-Up Period 1						
H1	Revenue From Period 1	40,603,718.50				
H2	Revenue From Max Permitted Rate for Period 1	43,125,752.32				
H3	True-Up Period 1 Adjustment [H2-H1]	\$2,522,033.82				
H4	Interest on Period 1 Adjustment	\$291,708.68				
Adjustment For True-Up Period 2						
H5	Revenue From Period 2 Eligible for Interest					
H6	Revenue From Max Perm Rate for Period 2 Eligible For Interest					
H7	Period 2 Adjustment Eligible For Interest [H6-H5]					
H8	Interest on Period 2 Adjustment (See instructions for formula)					
H9	Revenue From Period 2 Ineligible for Interest					
H10	Revenue From Max Perm Rate for Period 2 Ineligible for Interest					
H11	Period 2 Adjustment Ineligible For Interest [H10-H9]					
Total True-Up Adjustment						
H12	Previous Remaining True-Up Adjustment	\$185,681.65				
H13	Total True-Up Adjustment [H3+H4+H7+H8+H11+H12]	\$2,999,424.15				
H14	Amount of True-Up Claimed For This Projected Period	\$2,999,424.15				
H15	Remaining True-Up Adjustment [H13-H14]	\$0.00				

**Part III: Projected Period
Module I: New Maximum Permitted Rate**

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
I1	Caps Method Segment For Projected Period [Wks 2]					
I2	Markup Method Segment For Projected Period [Wks 3]	\$0.0800				
I3	Chan Mvmnt Deletn Segment For Projected Period [Wks 4/5]	(\$3.4026)				
I4	Proj. Period Rate Eligible For Inflation [D8+F5+G5+I1+I2+I3]	\$13.2456				
I5	Inflation Segment for Projected Period [(I4*C5)-I4]	\$0.0729				
I6	Headend Upgrade Segment For Projected Period [Wks 6]					
I7	External Costs Segment For Projected Period [Wks 7]	\$3.9401				
I8	True-Up Segment For Projected Period	\$1.3281				
I9	Max Permitted Rate for Projected Period [I4+I5+I6+I7+I8]	\$18.5866	\$20.6497	(\$2.0631)		
I10	Operator Selected Rate For Projected Period	\$19.3100				

Note: The maximum permitted rate figures do not take into account any refund liability you may have. If you have previously been ordered by the Commission or your local franchising authority to make refunds, you are not relieved of your obligation to make such refunds even if the permitted rate is higher than the contested rate or your current rate.

Certification Statement

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE TITLE 18, SECTION 1001), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements made in this form are true and correct to the best of my knowledge and belief, and are made in good faith.

Signature	Date
Filing Signed by Joseph C. Lance	10/01/08 (Revised 11/24/08)
Name and Title of Person Completing this Form:	Joseph C. Lance, Assitant Controller - Eastern Division
Telephone number	Fax Number
610-650-3057	610-650-2625

Worksheet 1 - True-Up Period Inflation

For instructions, see Appendix A of Instructions For FCC Form 1240

Line	Period	FCC Inflation Factor	
101	Month 1	1.03%	Jul-07
102	Month 2	1.03%	Aug-07
103	Month 3	1.03%	Sep-07
104	Month 4	2.45%	Oct-07
105	Month 5	2.45%	Nov-07
106	Month 6	2.45%	Dec-07
107	Month 7	2.68%	Jan-08
108	Month 8	2.68%	Feb-08
109	Month 9	2.68%	Mar-08
110	Month 10	1.11%	Apr-08
111	Month 11	1.11%	May-08
112	Month 12	1.11%	Jun-08
113	Average Inflation Factor for True-Up Period 1	1.0182	
114	Month 13		Jul-08
115	Month 14		Aug-08
116	Month 15		Sep-08
117	Month 16		Oct-08
118	Month 17		Nov-08
119	Month 18		Dec-08
120	Month 19		Jan-09
121	Month 20		Feb-09
122	Month 21		Mar-09
123	Month 22		Apr-09
124	Month 23		May-09
125	Month 24		Jun-09
126	Average Inflation Factor for True-Up Period 2		

Worksheet 3 - Markup Method True-Up Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
X	

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

12

Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Period	1	2	3	4	5	6	7
		Sum of Previous Regulated Channels	Sum of Current Regulated Channel	Average Channels	Per Channel Adjustment	Channels Added	Total Adjustment	Cumulative Adjustment
301	Previous Month							0.0700
302	Month 1	34	34	79.0	\$0.01	0	\$0.00	0.0700
303	Month 2	34	34	79.0	\$0.01	0	\$0.00	0.0700
304	Month 3	34	34	79.0	\$0.01	0	\$0.00	0.0700
305	Month 4	34	34	79.0	\$0.01	0	\$0.00	0.0700
306	Month 5	34	34	79.0	\$0.01	0	\$0.00	0.0700
307	Month 6	34	34	79.0	\$0.01	0	\$0.00	0.0700
308	Month 7	34	32	76.0	\$0.01	0	\$0.00	0.0700
309	Month 8	32	32	76.0	\$0.01	0	\$0.00	0.0700
310	Month 9	32	32	76.0	\$0.01	0	\$0.00	0.0700
311	Month 10	32	32	76.0	\$0.01	0	\$0.00	0.0700
312	Month 11	32	32	76.0	\$0.01	0	\$0.00	0.0700
313	Month 12	32	32	76.0	\$0.01	0	\$0.00	0.0700
314	Average Period 1 Markup Method Adjustment							0.0700
315	Month 13							
316	Month 14							
317	Month 15							
318	Month 16							
319	Month 17							
320	Month 18							
321	Month 19							
322	Month 20							
323	Month 21							
324	Month 22							
325	Month 23							
326	Month 24							
327	Average Period 2 Caps Method Adjustment							

Worksheet 3 - Markup Method Projected Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
	X

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

12
0

Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Period	1	2	3	4	5	6	7
		Sum of Previous Regulated Channels	Sum of Current Regulated Channel	Average Channels	Per Channel Adjustment	Channels Added	Total Adjustment	Cumulative Adjustment
301	Previous Month							\$0.07
302	Month 1	32	33	76.0	\$0.01	1	\$0.01	\$0.08
303	Month 2	33	33	76.0	\$0.01	0	\$0.00	\$0.08
304	Month 3	33	33	76.0	\$0.01	0	\$0.00	\$0.08
305	Month 4	33	33	76.0	\$0.01	0	\$0.00	\$0.08
306	Month 5	33	33	76.0	\$0.01	0	\$0.00	\$0.08
307	Month 6	33	33	76.0	\$0.01	0	\$0.00	\$0.08
308	Month 7	33	33	76.0	\$0.01	0	\$0.00	\$0.08
309	Month 8	33	33	76.0	\$0.01	0	\$0.00	\$0.08
310	Month 9	33	33	76.0	\$0.01	0	\$0.00	\$0.08
311	Month 10	33	33	76.0	\$0.01	0	\$0.00	\$0.08
312	Month 11	33	33	76.0	\$0.01	0	\$0.00	\$0.08
313	Month 12	33	33	76.0	\$0.01	0	\$0.00	\$0.08
314	Average Period 1 Markup Method Adjustment							\$0.0800

Worksheet 4 - Residual True-Up Period

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
X	

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Period One						
401	Average Permitted Charge	\$19.3858				
402	Average External Costs	\$2.9739				
403	Average Total Per Channel Adjustments after 5/14/94 for Channels Added Using Caps Method					
404	Average Tier Residual [401-402-403]	\$16.4119				
405	Average Channels per Regulated Tier	33.0000				
406	Average Caps Method Channels per Tier	0.0000				
407	Average Remaining Channels [405-406]	33.0000				
408	Average Period 1 Per Channel Residual [404/407]	\$0.4973				
Period Two						
409	Average Permitted Charge					
410	Average External Costs	\$3.1147				
411	Average Total Per Channel Adjustments after 5/14/94 for Channels Added Using Caps Method					
412	Average Tier Residual [409-410-411]					
413	Average Channels per Regulated Tier					
414	Average Caps Method Channels per Tier	0.0000				
415	Average Remaining Channels [413-414]					
416	Average Period 2 Per Channel Residual [412/415]					

Worksheet 4 - Residual Projected Period

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
	X

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Period One						
401	Average Permitted Charge	\$19.3858				
402	Average External Costs	\$2.9739				
403	Average Total Per Channel Adjustments after 5/14/94 for Channels Added Using Caps Method					
404	Average Tier Residual [401-402-403]	\$16.4119				
405	Average Channels per Regulated Tier	32.2849				
406	Average Caps Method Channels per Tier	0.0000				
407	Average Remaining Channels [405-406]	32.2849				
408	Average Period 1 Per Channel Residual [404/407]	\$0.5083				

Worksheet 5 - Channel Movement and Deletion True-Up Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
X	

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

12

Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Period	1 Residual of Channels Deleted From Tier	2 Residual of Channels Moved (added) to Tier	3 Net Per-Channel Cost Adjustment [Column 2 - Column 1]	4 Cumulative Net Per- Channel Cost Adjustment
501	Previous Period				(\$2.0267)
502	Month 1			\$0.0000	(\$2.0267)
503	Month 2			\$0.0000	(\$2.0267)
504	Month 3			\$0.0000	(\$2.0267)
505	Month 4			\$0.0000	(\$2.0267)
506	Month 5			\$0.0000	(\$2.0267)
507	Month 6			\$0.0000	(\$2.0267)
508	Month 7	\$0.9947		(\$0.9947)	(\$3.0213)
509	Month 8			\$0.0000	(\$3.0213)
510	Month 9			\$0.0000	(\$3.0213)
511	Month 10			\$0.0000	(\$3.0213)
512	Month 11			\$0.0000	(\$3.0213)
513	Month 12			\$0.0000	(\$3.0213)
514	Average Period 1 Channel Movement and Deletion Adjustment				(\$2.5240)

515	Month 13				
516	Month 14				
517	Month 15				
518	Month 16				
519	Month 17				
520	Month 18				
521	Month 19				
522	Month 20				
523	Month 21				
524	Month 22				
525	Month 23				
526	Month 24				
527	Average Period 2 Channel Movement and Deletion Adjustment				

Worksheet 5 - Channel Movement and Deletion Projected Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
	X

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

12

Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

0

Line	Period	1	2	3	4
		Residual of Channels Deleted From Tier	Residual of Channels Moved (added) to Tier	Net Per-Channel Cost Adjustment [Column 2 - Column 1]	Cumulative Net Per-Channel Cost Adjustment
501	Previous Period				(\$3.0213)
502	Month 1			\$0.0000	(\$3.0213)
503	Month 2			\$0.0000	(\$3.0213)
504	Month 3			\$0.0000	(\$3.0213)
505	Month 4	\$0.5083		(\$0.5083)	(\$3.5297)
506	Month 5			\$0.0000	(\$3.5297)
507	Month 6			\$0.0000	(\$3.5297)
508	Month 7			\$0.0000	(\$3.5297)
509	Month 8			\$0.0000	(\$3.5297)
510	Month 9			\$0.0000	(\$3.5297)
511	Month 10			\$0.0000	(\$3.5297)
512	Month 11			\$0.0000	(\$3.5297)
513	Month 12			\$0.0000	(\$3.5297)
514	Average Period 1 Channel Movement and Deletion Adjustment				(\$3.4026)

Worksheet 7 - External Costs True-Up Period

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
X	

Question 1. For which time period are you filling out this worksheet? [Put an "X" in the appropriate box.]

Question 2. How long is the first period, in months, for which rates are being set with this worksheet?

12

Question 3. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
------	------------------	------------	-------------	-------------	-------------	-------------

Period 1

External Costs Eligible for Markup						
701	Cost of Programming For Channels Added Prior to 5/15/94 or After 5/15/94 Using Markup Method For Period	\$2,246,611.77				
702	Retransmission Consent Fees For Period					
703	Copyright Fees For Period	\$375,492.47				
704	External Costs Eligible For 7.5% Markup	\$2,622,104.24				
705	Marked Up External Costs	\$2,818,762.06				
External Costs Not Eligible for Markup						
706	Cable Specific Taxes For Period					
707	Franchise Related Costs For Period	\$4,074,277.62				
708	Commission Regulatory Fees For Period	\$141,148.50				
709	Total External Costs For Period	\$7,034,188.18				
710	Monthly, Per-Subscriber External Costs For Period 1	\$3.1147				

Period 2

External Costs Eligible for Markup						
711	Cost of Programming For Channels Added Prior to 5/15/94 or After 5/15/94 Using Markup Method For Period					
712	Retransmission Consent Fees For Period					
713	Copyright Fees For Period					
714	External Costs Eligible For 7.5% Markup					
715	Marked Up External Costs					
External Costs Not Eligible for Markup						
716	Cable Specific Taxes For Period					
717	Franchise Related Costs For Period					
718	Commission Regulatory Fees For Period					
719	Total External Costs For Period					
720	Monthly, Per-Subscriber External Costs For Period 2					

Worksheet 7 - External Costs Projected Period

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
	X
	12
	0

Question 1. For which time period are you filling out this worksheet? [Put an "X" in the appropriate box.]

Question 2. How long is the first period, in months, for which rates are being set with this worksheet?

Question 3. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Period 1						
External Costs Eligible for Markup						
701	Cost of Programming For Channels Added Prior to 5/15/94 or After 5/15/94 Using Markup Method For Period	\$3,805,506.66				
702	Retransmission Consent Fees For Period					
703	Copyright Fees For Period	\$406,055.81				
704	External Costs Eligible For 7.5% Markup	\$4,211,562.47				
705	Marked Up External Costs	\$4,527,429.65				
External Costs Not Eligible for Markup						
706	Cable Specific Taxes For Period					
707	Franchise Related Costs For Period	\$4,214,583.73				
708	Commission Regulatory Fees For Period	\$156,204.34				
709	Total External Costs For Period	\$8,898,217.72				
710	Monthly, Per-Subscriber External Costs For Period 1	\$3.9401				

FRC per Sub per month

1.866201078

Worksheet 8 - True-Up Rate Charged

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. How long is the True-Up Period 1, in months?

12

Question 2. How long is the True-Up Period 2, in months?

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
801	Jul-07	\$17.3200				
802	Aug-07	\$17.3200				
803	Sep-07	\$17.3200				
804	Oct-07	\$17.3100				
805	Nov-07	\$17.3100				
806	Dec-07	\$17.3100				
807	Jan-08	\$17.3100				
808	Feb-08	\$17.3100				
809	Mar-08	\$19.3100				
810	Apr-08	\$19.3100				
811	May-08	\$19.3100				
812	Jun-08	\$19.3100				
813	Period 1 Average Rate	\$17.9792				

814	Jul-08					
815	Aug-08					
816	Sep-08					
817	Oct-08					
818	Nov-08					
819	Dec-08					
820	Jan-09					
821	Feb-09					
822	Mar-09					
823	Apr-09					
824	May-09					
825	Jun-09					
826	Period 2 Average Rate					

APPENDIX D

MONTGOMERY COUNTY, MARYLAND
 Review of 2008 FCC Form 1240 Filing of Comcast
 Programming Cost Per Channel & Total Cost
 LABELED CONFIDENTIAL BY COMCAST - NOT FOR PUBLIC DISCLOSURE

Line No.	Chan.	Prog.	True-Up Period											
			Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08
1		WGN												
2		TV Guide Channel												
3		TNT												
4		CN8												
5		News Channel 8												
6		C-Span												
6		Total Cost Per Subscriber	\$183,206.35	\$183,206.59	\$183,206.34	\$183,206.34	\$183,206.59	\$183,206.33	\$192,629.33	\$192,629.45	\$192,629.45	\$189,828.09	\$189,828.50	\$189,828.43
7		Total Subscribers	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198
8		Cost Per Subscriber	\$0.97348	\$0.97348	\$0.97348	\$0.97348	\$0.97348	\$0.97348	\$1.02355	\$1.02355	\$1.02355	\$1.00866	\$1.00866	\$1.00866
9		Cost Per Subscriber Per Comcast	\$0.98910	\$0.98920	\$0.98910	\$0.98920	\$0.98960	\$0.98970	\$1.02560	\$1.02560	\$1.02560	\$1.02560	\$1.02570	\$1.02570
10		Difference	(\$0.01562)	(\$0.01572)	(\$0.01562)	(\$0.01572)	(\$0.01612)	(\$0.01622)	(\$0.00205)	(\$0.00205)	(\$0.00205)	(\$0.01694)	(\$0.01704)	(\$0.01704)
11		Total Programming Expense - True-Up Period [Sum of Line 12]												\$2,246,611.77
12		Total Programming Expense - Projected Period [Sum of Line 12]												
13		Average Subscribers [Line 17]												188,198

MONTGOMERY COUNTY, MARYLAND
 Review of 2008 FCC Form 1240 Filing of Comcast
 Programming Cost Per Channel & Total Cost
 LABELED CONFIDENTIAL BY COMCAST - NOT FOR PUBLIC DISCLOSURE

Line No.	Chan.	Prog.	Projected Period											
			Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09
1		WGN												
2		TV Guide Channel												
3		TNT												
4		CN8												
5		News Channel 8												
6		C-Span												
6		Total Cost Per Subscriber	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55	\$317,125.55
7		Total Subscribers	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198	188,198
8		Cost Per Subscriber	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506	\$1.68506
9		Cost Per Subscriber Per Comcast	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210	\$1.70210
10		Difference	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)	(\$0.01704)
11		Total Programming Expense - True-Up Period [Sum of Line 12]												
12		Total Programming Expense - Projected Period [Sum of Line 12]												
13		Average Subscribers [Line 17]	188,198											

APPENDIX E

MONTGOMERY COUNTY, MARYLAND
Review of 2007 FCC Form 1240 Filed by Comcast Cablevision
Analysis of Franchise-related Costs

APPENDIX E

Line No.	Date Paid	Description/Date	Payments	Months of Amort.	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08
1	17-Feb-99	Reimburse County for Expenses	\$200,000.00	7					
2	Year 1	PEG Support Fund	\$1,500,000.00	12					
3	Year 2	PEG Support Fund	\$1,525,500.00	12					
4	Year 3	PEG Support Fund	\$1,565,163.00	12					
5	Year 4	PEG Support Fund	\$1,615,248.00	12					
6	Year 5	PEG Support Fund	\$1,651,591.00	12					
7	Year 6	PEG Support Fund	\$1,697,510.00	12					
8	Year 7	PEG Support Fund	\$1,739,948.00	12					
9	Year 8	PEG Support Fund	\$1,800,846.00	12					
10	Year 9	PEG Support Fund	\$1,873,601.00	12					
11	Year 10	PEG Support Fund	\$1,938,054.00	12					
12	Year 11	PEG Support Fund	\$1,938,054.00	12	\$161,504.50	\$161,504.50	\$161,504.50	\$161,504.50	\$161,504.50
13	Year 12	PEG Support Fund	\$1,938,054.00	12					
9	Year 1	Capital Grant for Access Equipment	\$1,800,000.00	180	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00
14	Year 2	Capital Grant for Access Equipment	\$1,000,000.00	168	\$5,952.38	\$5,952.38	\$5,952.38	\$5,952.38	\$5,952.38
15	Year 1	Capital Grant for Access Equip. - Maint.	\$200,000.00	12					
16	Year 2	Capital Grant for Access Equip. - Maint.	\$200,000.00	12					
17	Year 3	Capital Grant for Access Equip. - Maint.	\$200,000.00	12					
18	Year 4	Capital Grant for Access Equip. - Maint.	\$206,400.00	12					
19	Year 5	Capital Grant for Access Equip. - Maint.	\$211,044.00	12					
20	Year 6	Capital Grant for Access Equip. - Maint.	\$216,912.00	12					
21	Year 7	Capital Grant for Access Equip. - Maint.	\$222,335.00	12					
22	Year 8	Capital Grant for Access Equip. - Maint.	\$230,117.00	12					
23	Year 9	Capital Grant for Access Equip. - Maint.	\$239,414.00	12					
24	Year 10	Capital Grant for Access Equip. - Maint.	\$247,650.00	12					
25	Year 11	Capital Grant for Access Equip. - Maint.	\$247,650.00	12	\$20,637.50	\$20,637.50	\$20,637.50	\$20,637.50	\$20,637.50
26	Year 12	Capital Grant for Access Equip. - Maint.	\$247,650.00	12					
23	Year 1	I-Net Separate Grant	\$1,250,000.00	180	\$6,944.44	\$6,944.44	\$6,944.44	\$6,944.44	\$6,944.44
27	Year 2	I-Net Capital Grant	\$1,250,000.00	168	\$7,440.48	\$7,440.48	\$7,440.48	\$7,440.48	\$7,440.48
28	Year 3	I-Net Capital Grant	\$1,282,500.00	12					
29	Year 4	I-Net Capital Grant	\$1,270,598.00	12					
30	Year 5	I-Net Capital Grant	\$1,299,187.00	12					
31	Year 6	I-Net Capital Grant	\$1,335,307.00	12					
32	Year 7	I-Net Capital Grant	\$1,368,690.00	12					
33	Year 8	I-Net Capital Grant	\$1,416,594.00	12					
34	Year 9	I-Net Capital Grant	\$1,473,824.00	12					
35	Year 10	I-Net Capital Grant	\$1,524,526.00	12					
36	Year 11	I-Net Capital Grant	\$1,524,526.00	12	\$127,043.83	\$127,043.83	\$127,043.83	\$127,043.83	\$127,043.83
37	Year 12	I-Net Capital Grant	\$1,524,526.00	12					
33	17-May-99	LOC Fees	\$163,135.96	3					
38	16-Aug-99	LOC Fees	\$498,543.91	3					
39	15-Nov-99	LOC Fees	\$465,916.41	3					
40	16-Feb-00	LOC Fees	\$431,870.29	3					
41	15-May-00	LOC Fees	\$429,338.38	3					
42	18-Aug-00	LOC Fees	\$345,652.55	3					
43	29-Dec-00	LOC Fees	\$53,216.90	3					
44	31-Mar-01	LOC Fees	\$65,609.88	3					
45	30-Jun-01	LOC Fees	\$38,744.53	3					
46	30-Sep-01	LOC Fees	\$25,450.18	3					
47	31-Dec-01	LOC Fees	\$25,450.19	3					
48		TOTAL			\$339,523.13	\$339,523.13	\$339,523.13	\$339,523.13	\$339,523.13
49		TOTAL 7/1/2007 - 6/30/2008 True Up Period I							
50		TOTAL 1/1/2009 - 12/31/2009 Projected							
51		TOTAL WITH INTEREST							

APPENDIX F

MONTGOMERY COUNTY, MARYLAND

Comcast Cable of Maryland, Inc.

Review of Franchise-Related Costs

Annual Interest Rate

7.00%

Line No.	Month	Description/Date	Balance	Payments	Principal	Interest	Cumulative Principal	Cumulative Interest	Ending Balance
		Capital Grant (Sec. 7(b))							
1	22-Sep-98	10/98 Payment	\$450,000	\$4,083.60	\$1,458.60	\$2,625.00	\$1,458.60	\$2,625.00	\$448,541.40
2	31-Oct-98		450,000	4,084	1,467	2,616	2,926	5,241	447,074
3	30-Nov-98		450,000	4,084	1,476	2,608	4,401	7,849	445,599
4	31-Dec-98	01/99 Payment	900,000	8,208	5,608	2,599	10,010	10,449	889,990
5	31-Jan-99		900,000	8,208	3,016	5,192	13,026	15,640	886,974
6	28-Feb-99		900,000	8,208	3,034	5,174	16,059	20,814	883,941
7	31-Mar-99	04/99 Payment	1,350,000	12,373	7,217	5,156	23,276	25,971	1,326,724
8	30-Apr-99		1,350,000	12,373	4,634	7,739	27,910	33,710	1,322,090
9	31-May-99		1,350,000	12,373	4,661	7,712	32,571	41,422	1,317,429
10	30-Jun-99	07/99 Payment	1,800,000	16,583	8,898	7,685	41,469	49,107	1,758,531
11	31-Jul-99		1,800,000	16,583	6,325	10,258	47,794	59,365	1,752,206
12	31-Aug-99		1,800,000	16,583	6,361	10,221	54,155	69,586	1,745,845
13	30-Sep-99	10/99 Payment	2,050,000	18,946	8,762	10,184	62,917	79,771	1,987,083
14	31-Oct-99		2,050,000	18,946	7,355	11,591	70,272	91,362	1,979,728
15	30-Nov-99		2,050,000	18,946	7,398	11,548	77,670	102,910	1,972,330
16	31-Dec-99	01/00 Payment	2,300,000	21,336	9,831	11,505	87,501	114,415	2,212,499
17	31-Jan-00		2,300,000	21,336	8,430	12,906	95,931	127,322	2,204,069
18	29-Feb-00		2,300,000	21,336	8,479	12,857	104,409	140,179	2,195,591
19	31-Mar-00	04/00 Payment	2,550,000	23,753	10,945	12,808	115,355	152,986	2,434,645
20	30-Apr-00		2,550,000	23,753	9,551	14,202	124,906	167,189	2,425,094
21	31-May-00		2,550,000	23,753	9,607	14,146	134,512	181,335	2,415,488
22	30-Jun-00	07/00 Payment	2,800,000	26,198	12,108	14,090	146,620	195,425	2,653,380
23	31-Jul-00		2,800,000	26,198	10,720	15,478	157,340	210,903	2,642,660
24	31-Aug-00		2,800,000	26,198	10,783	15,416	168,122	226,319	2,631,878
25	30-Sep-00		2,800,000	26,198	10,845	15,353	178,968	241,671	2,621,032
26	31-Oct-00		2,800,000	26,198	10,909	15,289	189,876	256,961	2,610,124
27	30-Nov-00		2,800,000	26,198	10,972	15,226	200,849	272,187	2,599,151
28	31-Dec-00		2,800,000	26,198	11,036	15,162	211,885	287,348	2,588,115
29	31-Jan-01		2,800,000	26,198	11,101	15,097	222,986	302,446	2,577,014
30	28-Feb-01		2,800,000	26,198	11,165	15,033	234,151	317,478	2,565,849
31	31-Mar-01		2,800,000	26,198	11,231	14,967	245,382	332,446	2,554,618
32	30-Apr-01		2,800,000	26,198	11,296	14,902	256,678	347,348	2,543,322
33	31-May-01		2,800,000	26,198	11,362	14,836	268,040	362,184	2,531,960
34	30-Jun-01		2,800,000	26,198	11,428	14,770	279,469	376,953	2,520,531
35	31-Jul-01		2,800,000	26,198	11,495	14,703	290,963	391,656	2,509,037
36	31-Aug-01		2,800,000	26,198	11,562	14,636	302,526	406,292	2,497,474
37	30-Sep-01		2,800,000	26,198	11,629	14,569	314,155	420,861	2,485,845
38	31-Oct-01		2,800,000	26,198	11,697	14,501	325,852	435,362	2,474,148
39	30-Nov-01		2,800,000	26,198	11,766	14,433	337,618	449,794	2,462,382
40	31-Dec-01		2,800,000	26,198	11,834	14,364	349,452	464,158	2,450,548
41	31-Jan-02		2,800,000	26,198	11,903	14,295	361,355	478,453	2,438,645
42	28-Feb-02		2,800,000	26,198	11,973	14,225	373,328	492,679	2,426,672
43	31-Mar-02		2,800,000	26,198	12,042	14,156	385,370	506,834	2,414,630
44	30-Apr-02		2,800,000	26,198	12,113	14,085	397,483	520,920	2,402,517
45	31-May-02		2,800,000	26,198	12,183	14,015	409,666	534,934	2,390,334
46	30-Jun-02		2,800,000	26,198	12,254	13,944	421,921	548,878	2,378,079
47	31-Jul-02		2,800,000	26,198	12,326	13,872	434,247	562,750	2,365,753
48	31-Aug-02		2,800,000	26,198	12,398	13,800	446,645	576,550	2,353,355
49	30-Sep-02		2,800,000	26,198	12,470	13,728	459,115	590,278	2,340,885
50	31-Oct-02		2,800,000	26,198	12,543	13,655	471,658	603,933	2,328,342
51	30-Nov-02		2,800,000	26,198	12,616	13,582	484,274	617,515	2,315,726
52	31-Dec-02		2,800,000	26,198	12,690	13,508	496,964	631,024	2,303,036
53	31-Jan-03		2,800,000	26,198	12,764	13,434	509,727	644,458	2,290,273
54	28-Feb-03		2,800,000	26,198	12,838	13,360	522,565	657,818	2,277,435
55	31-Mar-03		2,800,000	26,198	12,913	13,285	535,478	671,103	2,264,522
56	30-Apr-03		2,800,000	26,198	12,988	13,210	548,467	684,313	2,251,533
57	31-May-03		2,800,000	26,198	13,064	13,134	561,531	697,447	2,238,469
58	30-Jun-03		2,800,000	26,198	13,140	13,058	574,671	710,504	2,225,329
59	31-Jul-03		2,800,000	26,198	13,217	12,981	587,888	723,485	2,212,112
60	31-Aug-03		2,800,000	26,198	13,294	12,904	601,182	736,389	2,198,818

MONTGOMERY COUNTY, MARYLAND

Comcast Cable of Maryland, Inc.

Review of Franchise-Related Costs

Annual Interest Rate

7.00%

Line No.	Month	Description/Date	Balance	Payments	Principal	Interest	Cumulative Principal	Cumulative Interest	Ending Balance
61	30-Sep-03		2,800,000	26,198	13,372	12,826	614,554	749,216	2,185,446
62	31-Oct-03		2,800,000	26,198	13,450	12,748	628,004	761,964	2,171,996
63	30-Nov-03		2,800,000	26,198	13,528	12,670	641,532	774,634	2,158,468
64	31-Dec-03		2,800,000	26,198	13,607	12,591	655,139	787,225	2,144,861
65	31-Jan-04		2,800,000	26,198	13,686	12,512	668,825	799,737	2,131,175
66	28-Feb-04		2,800,000	26,198	13,766	12,432	682,591	812,169	2,117,409
67	31-Mar-04		2,800,000	26,198	13,847	12,352	696,438	824,520	2,103,562
68	30-Apr-04		2,800,000	26,198	13,927	12,271	710,365	836,791	2,089,635
69	31-May-04		2,800,000	26,198	14,009	12,190	724,374	848,981	2,075,626
70	30-Jun-04		2,800,000	26,198	14,090	12,108	738,464	861,089	2,061,536
71	31-Jul-04		2,800,000	26,198	14,172	12,026	752,636	873,114	2,047,364
72	31-Aug-04		2,800,000	26,198	14,255	11,943	766,891	885,057	2,033,109
73	30-Sep-04		2,800,000	26,198	14,338	11,860	781,230	896,917	2,018,770
74	31-Oct-04		2,800,000	26,198	14,422	11,776	795,652	908,693	2,004,348
75	30-Nov-04		2,800,000	26,198	14,506	11,692	810,158	920,385	1,989,842
76	31-Dec-04		2,800,000	26,198	14,591	11,607	824,748	931,993	1,975,252
77	31-Jan-05		2,800,000	26,198	14,676	11,522	839,424	943,515	1,960,576
78	28-Feb-05		2,800,000	26,198	14,761	11,437	854,186	954,952	1,945,814
79	31-Mar-05		2,800,000	26,198	14,847	11,351	869,033	966,302	1,930,967
80	30-Apr-05		2,800,000	26,198	14,934	11,264	883,967	977,566	1,916,033
81	31-May-05		2,800,000	26,198	15,021	11,177	898,988	988,743	1,901,012
82	30-Jun-05		2,800,000	26,198	15,109	11,089	914,097	999,832	1,885,903
83	31-Jul-05		2,800,000	26,198	15,197	11,001	929,294	1,010,833	1,870,706
84	31-Aug-05		2,800,000	26,198	15,286	10,912	944,580	1,021,746	1,855,420
85	30-Sep-05		2,800,000	26,198	15,375	10,823	959,955	1,032,569	1,840,045
86	31-Oct-05		2,800,000	26,198	15,464	10,734	975,419	1,043,303	1,824,581
87	30-Nov-05		2,800,000	26,198	15,555	10,643	990,974	1,053,946	1,809,026
88	31-Dec-05		2,800,000	26,198	15,645	10,553	1,006,619	1,064,499	1,793,381
89	31-Jan-06		2,800,000	26,198	15,737	10,461	1,022,356	1,074,960	1,777,644
90	28-Feb-06		2,800,000	26,198	15,828	10,370	1,038,184	1,085,330	1,761,816
91	31-Mar-06		2,800,000	26,198	15,921	10,277	1,054,105	1,095,607	1,745,895
92	30-Apr-06		2,800,000	26,198	16,014	10,184	1,070,119	1,105,791	1,729,881
93	31-May-06		2,800,000	26,198	16,107	10,091	1,086,226	1,115,882	1,713,774
94	30-Jun-06		2,800,000	26,198	16,201	9,997	1,102,427	1,125,879	1,697,573
95	31-Jul-06		2,800,000	26,198	16,296	9,903	1,118,723	1,135,782	1,681,277
96	31-Aug-06		2,800,000	26,198	16,391	9,807	1,135,113	1,145,589	1,664,887
97	30-Sep-06		2,800,000	26,198	16,486	9,712	1,151,599	1,155,301	1,648,401
98	31-Oct-06		2,800,000	26,198	16,582	9,616	1,168,182	1,164,917	1,631,818
99	30-Nov-06		2,800,000	26,198	16,679	9,519	1,184,861	1,174,436	1,615,139
100	31-Dec-06		2,800,000	26,198	16,776	9,422	1,201,637	1,183,857	1,598,363
101	31-Jan-07		2,800,000	26,198	16,874	9,324	1,218,512	1,193,181	1,581,488
102	28-Feb-07		2,800,000	26,198	16,973	9,225	1,235,484	1,202,406	1,564,516
103	31-Mar-07		2,800,000	26,198	17,072	9,126	1,252,556	1,211,533	1,547,444
104	30-Apr-07		2,800,000	26,198	17,171	9,027	1,269,727	1,220,560	1,530,273
105	31-May-07		2,800,000	26,198	17,271	8,927	1,286,999	1,229,486	1,513,001
106	30-Jun-07		2,800,000	26,198	17,372	8,826	1,304,371	1,238,312	1,495,629
107	31-Jul-07		2,800,000	26,198	17,474	8,725	1,321,845	1,247,036	1,478,155
108	31-Aug-07		2,800,000	26,198	17,576	8,623	1,339,420	1,255,659	1,460,580
109	30-Sep-07		2,800,000	26,198	17,678	8,520	1,357,098	1,264,179	1,442,902
110	31-Oct-07		2,800,000	26,198	17,781	8,417	1,374,879	1,272,596	1,425,121
111	30-Nov-07		2,800,000	26,198	17,885	8,313	1,392,764	1,280,909	1,407,236
112	31-Dec-07		2,800,000	26,198	17,989	8,209	1,410,753	1,289,118	1,389,247
113	31-Jan-08		2,800,000	26,198	18,094	8,104	1,428,848	1,297,222	1,371,152
114	28-Feb-08		2,800,000	26,198	18,200	7,998	1,447,047	1,305,220	1,352,953
115	31-Mar-08		2,800,000	26,198	18,306	7,892	1,465,353	1,313,113	1,334,647
116	30-Apr-08		2,800,000	26,198	18,413	7,785	1,483,766	1,320,898	1,316,234
117	31-May-08		2,800,000	26,198	18,520	7,678	1,502,286	1,328,576	1,297,714
118	30-Jun-08		2,800,000	26,198	18,628	7,570	1,520,914	1,336,146	1,279,086
119	31-Jul-08		2,800,000	26,198	18,737	7,461	1,539,651	1,343,607	1,260,349
120	31-Aug-08		2,800,000	26,198	18,846	7,352	1,558,497	1,350,960	1,241,503
121	30-Sep-08		2,800,000	26,198	18,956	7,242	1,577,453	1,358,202	1,222,547

MONTGOMERY COUNTY, MARYLAND

Comcast Cable of Maryland, Inc.

Review of Franchise-Related Costs

Annual Interest Rate

7.00%

Line No.	Month	Description/Date	Balance	Payments	Principal	Interest	Cumulative Principal	Cumulative Interest	Ending Balance
118	31-Oct-08		2,800,000	26,198	19,067	7,132	1,596,519	1,365,333	1,203,481
119	30-Nov-08		2,800,000	26,198	19,178	7,020	1,615,697	1,372,353	1,184,303
120	31-Dec-08		2,800,000	26,198	19,290	6,908	1,634,987	1,379,262	1,165,013
121	31-Jan-09		2,800,000	26,198	19,402	6,796	1,654,389	1,386,058	1,145,611
122	28-Feb-09		2,800,000	26,198	19,515	6,683	1,673,904	1,392,741	1,126,096
123	31-Mar-09		2,800,000	26,198	19,629	6,569	1,693,533	1,399,309	1,106,467
124	30-Apr-09		2,800,000	26,198	19,744	6,454	1,713,277	1,405,764	1,086,723
125	31-May-09		2,800,000	26,198	19,859	6,339	1,733,136	1,412,103	1,066,864
126	30-Jun-09		2,800,000	26,198	19,975	6,223	1,753,110	1,418,326	1,046,890
126	31-Jul-09		2,800,000	26,198	20,091	6,107	1,773,202	1,424,433	1,026,798
117	31-Aug-09		2,800,000	26,198	20,208	5,990	1,793,410	1,430,423	1,006,590
127	30-Sep-09		2,800,000	26,198	20,326	5,872	1,813,736	1,436,295	986,264
128	31-Oct-09		2,800,000	26,198	20,445	5,753	1,834,181	1,442,048	965,819
129	30-Nov-09		2,800,000	26,198	20,564	5,634	1,854,745	1,447,682	945,255
130	31-Dec-09		2,800,000	26,198	20,684	5,514	1,875,429	1,453,196	924,571
121		Interest 07/1/2007 - 06/30/2008				\$97,834.15			
131		Interest 01/1/2009 - 12/31/2009				\$73,933.94			

MONTGOMERY COUNTY, MARYLAND

Comcast Cable of Maryland, Inc.

Review of Franchise-Related Costs

Annual Interest Rate

7.00%

Line No.	Month	Description/Date	Balance	Payments	Principal	Interest	Cumulative Principal	Cumulative Interest	Ending Balance
Institutional Network Capital Grant (Sec. 7(h)(3))									
132	30-Sep-98	09/98 Payment	\$312,500	\$2,835.84	\$1,012.92	\$1,822.92	\$1,012.92	\$1,822.92	\$311,487.08
133	31-Oct-98		312,500	2,836	1,019	1,817	2,032	3,640	310,468
134	30-Nov-98		312,500	2,836	1,025	1,811	3,057	5,451	309,443
135	31-Dec-98	12/98 Payment	625,000	5,700	3,895	1,805	6,951	7,256	618,049
136	31-Jan-99		625,000	5,700	2,094	3,605	9,046	10,861	615,954
137	28-Feb-99		625,000	5,700	2,107	3,593	11,152	14,454	613,848
138	31-Mar-99	03/99 Payment	937,500	8,593	5,012	3,581	16,164	18,035	921,336
139	30-Apr-99		937,500	8,593	3,218	5,374	19,382	23,410	918,118
140	31-May-99		937,500	8,593	3,237	5,356	22,619	28,765	914,881
141	30-Jun-99	06/99 Payment	1,250,000	11,516	6,179	5,337	28,798	34,102	1,221,202
142	31-Jul-99		1,250,000	11,516	4,392	7,124	33,190	41,226	1,216,810
143	31-Aug-99		1,250,000	11,516	4,418	7,098	37,608	48,324	1,212,392
144	30-Sep-99	09/99 Payment	1,562,500	14,470	7,398	7,072	45,006	55,396	1,517,494
145	31-Oct-99		1,562,500	14,470	5,618	8,852	50,624	64,248	1,511,876
146	30-Nov-99		1,562,500	14,470	5,651	8,819	56,275	73,068	1,506,225
147	31-Dec-99	12/99 Payment	1,875,000	17,457	8,671	8,786	64,946	81,854	1,810,054
148	31-Jan-00		1,875,000	17,457	6,899	10,559	71,845	92,412	1,803,155
149	29-Feb-00		1,875,000	17,457	6,939	10,518	78,784	102,931	1,796,216
150	31-Mar-00	03/00 Payment	2,187,500	20,479	10,001	10,478	88,784	113,409	2,098,716
151	30-Apr-00		2,187,500	20,479	8,236	12,243	97,020	125,651	2,090,480
152	31-May-00		2,187,500	20,479	8,284	12,194	105,304	137,846	2,082,196
153	30-Jun-00	06/00 Payment	2,500,000	23,535	11,389	12,146	116,693	149,992	2,383,307
154	31-Jul-00		2,500,000	23,535	9,632	13,903	126,326	163,895	2,373,674
155	31-Aug-00		2,500,000	23,535	9,689	13,846	136,014	177,741	2,363,986
156	30-Sep-00		2,500,000	23,535	9,745	13,790	145,759	191,531	2,354,241
157	31-Oct-00		2,500,000	23,535	9,802	13,733	155,561	205,264	2,344,439
158	30-Nov-00		2,500,000	23,535	9,859	13,676	165,420	218,940	2,334,580
159	31-Dec-00		2,500,000	23,535	9,917	13,618	175,337	232,558	2,324,663
160	31-Jan-01		2,500,000	23,535	9,974	13,561	185,311	246,119	2,314,689
161	28-Feb-01		2,500,000	23,535	10,033	13,502	195,344	259,621	2,304,656
162	31-Mar-01		2,500,000	23,535	10,091	13,444	205,435	273,065	2,294,565
163	30-Apr-01		2,500,000	23,535	10,150	13,385	215,585	286,450	2,284,415
164	31-May-01		2,500,000	23,535	10,209	13,326	225,794	299,776	2,274,206
165	30-Jun-01		2,500,000	23,535	10,269	13,266	236,063	313,042	2,263,937
166	31-Jul-01		2,500,000	23,535	10,329	13,206	246,392	326,248	2,253,608
167	31-Aug-01		2,500,000	23,535	10,389	13,146	256,781	339,394	2,243,219
168	30-Sep-01		2,500,000	23,535	10,450	13,085	267,231	352,480	2,232,769
169	31-Oct-01		2,500,000	23,535	10,511	13,024	277,741	365,504	2,222,259
170	30-Nov-01		2,500,000	23,535	10,572	12,963	288,313	378,467	2,211,687
171	31-Dec-01		2,500,000	23,535	10,633	12,902	298,946	391,369	2,201,054
172	31-Jan-02		2,500,000	23,535	10,696	12,839	309,642	404,208	2,190,358
173	28-Feb-02		2,500,000	23,535	10,758	12,777	320,400	416,985	2,179,600
174	31-Mar-02		2,500,000	23,535	10,821	12,714	331,220	429,700	2,168,780
175	30-Apr-02		2,500,000	23,535	10,884	12,651	342,104	442,351	2,157,896
176	31-May-02		2,500,000	23,535	10,947	12,588	353,052	454,939	2,146,948
177	30-Jun-02		2,500,000	23,535	11,011	12,524	364,063	467,463	2,135,937
178	31-Jul-02		2,500,000	23,535	11,075	12,460	375,138	479,922	2,124,862
179	31-Aug-02		2,500,000	23,535	11,140	12,395	386,278	492,317	2,113,722
180	30-Sep-02		2,500,000	23,535	11,205	12,330	397,483	504,647	2,102,517
181	31-Oct-02		2,500,000	23,535	11,270	12,265	408,753	516,912	2,091,247
182	30-Nov-02		2,500,000	23,535	11,336	12,199	420,089	529,111	2,079,911
183	31-Dec-02		2,500,000	23,535	11,402	12,133	431,492	541,244	2,068,508
184	31-Jan-03		2,500,000	23,535	11,469	12,066	442,960	553,310	2,057,040
185	28-Feb-03		2,500,000	23,535	11,536	11,999	454,496	565,309	2,045,504
186	31-Mar-03		2,500,000	23,535	11,603	11,932	466,099	577,241	2,033,901
187	30-Apr-03		2,500,000	23,535	11,671	11,864	477,769	589,106	2,022,231
188	31-May-03		2,500,000	23,535	11,739	11,796	489,508	600,902	2,010,492
189	30-Jun-03		2,500,000	23,535	11,807	11,728	501,315	612,630	1,998,685
190	31-Jul-03		2,500,000	23,535	11,876	11,659	513,191	624,289	1,986,809
191	31-Aug-03		2,500,000	23,535	11,945	11,590	525,136	635,879	1,974,864

MONTGOMERY COUNTY, MARYLAND

Comcast Cable of Maryland, Inc.

Review of Franchise-Related Costs

Annual Interest Rate

7.00%

Line No.	Month	Description/Date	Balance	Payments	Principal	Interest	Cumulative Principal	Cumulative Interest	Ending Balance
192	30-Sep-03		2,500,000	23,535	12,015	11,520	537,151	647,399	1,962,849
193	31-Oct-03		2,500,000	23,535	12,085	11,450	549,236	658,849	1,950,764
194	30-Nov-03		2,500,000	23,535	12,156	11,379	561,392	670,228	1,938,608
195	31-Dec-03		2,500,000	23,535	12,226	11,309	573,618	681,537	1,926,382
196	31-Jan-04		2,500,000	23,535	12,298	11,237	585,916	692,774	1,914,084
197	28-Feb-04		2,500,000	23,535	12,370	11,165	598,286	703,940	1,901,714
198	31-Mar-04		2,500,000	23,535	12,442	11,093	610,727	715,033	1,889,273
199	30-Apr-04		2,500,000	23,535	12,514	11,021	623,242	726,054	1,876,758
200	31-May-04		2,500,000	23,535	12,587	10,948	635,829	737,001	1,864,171
201	30-Jun-04		2,500,000	23,535	12,661	10,874	648,490	747,876	1,851,510
202	31-Jul-04		2,500,000	23,535	12,735	10,800	661,224	758,676	1,838,776
203	31-Aug-04		2,500,000	23,535	12,809	10,726	674,033	769,402	1,825,967
204	30-Sep-04		2,500,000	23,535	12,884	10,651	686,916	780,054	1,813,084
205	31-Oct-04		2,500,000	23,535	12,959	10,576	699,875	790,630	1,800,125
206	30-Nov-04		2,500,000	23,535	13,034	10,501	712,909	801,131	1,787,091
207	31-Dec-04		2,500,000	23,535	13,110	10,425	726,020	811,556	1,773,980
208	31-Jan-05		2,500,000	23,535	13,187	10,348	739,206	821,904	1,760,794
209	28-Feb-05		2,500,000	23,535	13,264	10,271	752,470	832,175	1,747,530
210	31-Mar-05		2,500,000	23,535	13,341	10,194	765,811	842,369	1,734,189
211	30-Apr-05		2,500,000	23,535	13,419	10,116	779,230	852,485	1,720,770
212	31-May-05		2,500,000	23,535	13,497	10,038	792,727	862,523	1,707,273
213	30-Jun-05		2,500,000	23,535	13,576	9,959	806,303	872,482	1,693,697
214	31-Jul-05		2,500,000	23,535	13,655	9,880	819,958	882,362	1,680,042
215	31-Aug-05		2,500,000	23,535	13,735	9,800	833,693	892,162	1,666,307
216	30-Sep-05		2,500,000	23,535	13,815	9,720	847,508	901,882	1,652,492
217	31-Oct-05		2,500,000	23,535	13,895	9,640	861,403	911,522	1,638,597
218	30-Nov-05		2,500,000	23,535	13,977	9,558	875,380	921,080	1,624,620
219	31-Dec-05		2,500,000	23,535	14,058	9,477	889,438	930,557	1,610,562
220	31-Jan-06		2,500,000	23,535	14,140	9,395	903,578	939,952	1,596,422
221	28-Feb-06		2,500,000	23,535	14,223	9,312	917,801	949,265	1,582,199
222	31-Mar-06		2,500,000	23,535	14,306	9,229	932,106	958,494	1,567,894
223	30-Apr-06		2,500,000	23,535	14,389	9,146	946,495	967,640	1,553,505
224	31-May-06		2,500,000	23,535	14,473	9,062	960,968	976,702	1,539,032
225	30-Jun-06		2,500,000	23,535	14,557	8,978	975,525	985,680	1,524,475
226	31-Jul-06		2,500,000	23,535	14,642	8,893	990,168	994,573	1,509,832
227	31-Aug-06		2,500,000	23,535	14,728	8,807	1,004,895	1,003,380	1,495,105
228	30-Sep-06		2,500,000	23,535	14,814	8,721	1,019,709	1,012,102	1,480,291
229	31-Oct-06		2,500,000	23,535	14,900	8,635	1,034,609	1,020,737	1,465,391
230	30-Nov-06		2,500,000	23,535	14,987	8,548	1,049,596	1,029,285	1,450,404
231	31-Dec-06		2,500,000	23,535	15,074	8,461	1,064,670	1,037,745	1,435,330
232	31-Jan-07		2,500,000	23,535	15,162	8,373	1,079,832	1,046,118	1,420,168
233	28-Feb-07		2,500,000	23,535	15,251	8,284	1,095,083	1,054,403	1,404,917
234	31-Mar-07		2,500,000	23,535	15,340	8,195	1,110,423	1,062,598	1,389,577
235	30-Apr-07		2,500,000	23,535	15,429	8,106	1,125,852	1,070,704	1,374,148
236	31-May-07		2,500,000	23,535	15,519	8,016	1,141,371	1,078,720	1,358,629
237	30-Jun-07		2,500,000	23,535	15,610	7,925	1,156,980	1,086,645	1,343,020
238	31-Jul-07		2,500,000	23,535	15,701	7,834	1,172,681	1,094,479	1,327,319
239	31-Aug-07		2,500,000	23,535	15,792	7,743	1,188,474	1,102,222	1,311,526
240	30-Sep-07		2,500,000	23,535	15,884	7,651	1,204,358	1,109,872	1,295,642
241	31-Oct-07		2,500,000	23,535	15,977	7,558	1,220,335	1,117,430	1,279,665
242	30-Nov-07		2,500,000	23,535	16,070	7,465	1,236,405	1,124,895	1,263,595
243	31-Dec-07		2,500,000	23,535	16,164	7,371	1,252,569	1,132,266	1,247,431
244	31-Jan-08		2,500,000	23,535	16,258	7,277	1,268,828	1,139,543	1,231,172
245	28-Feb-08		2,500,000	23,535	16,353	7,182	1,285,181	1,146,725	1,214,819
246	31-Mar-08		2,500,000	23,535	16,449	7,086	1,301,629	1,153,811	1,198,371
247	30-Apr-08		2,500,000	23,535	16,545	6,990	1,318,174	1,160,802	1,181,826
248	31-May-08		2,500,000	23,535	16,641	6,894	1,334,815	1,167,696	1,165,185
249	30-Jun-08		2,500,000	23,535	16,738	6,797	1,351,553	1,174,492	1,148,447
250	31-Jul-08		2,500,000	23,535	16,836	6,699	1,368,389	1,181,192	1,131,611
251	31-Aug-08		2,500,000	23,535	16,934	6,601	1,385,323	1,187,793	1,114,677
252	30-Sep-08		2,500,000	23,535	17,033	6,502	1,402,355	1,194,295	1,097,645

MONTGOMERY COUNTY, MARYLAND

Comcast Cable of Maryland, Inc.

Review of Franchise-Related Costs

Annual Interest Rate

7.00%

Line No.	Month	Description/Date	Balance	Payments	Principal	Interest	Cumulative Principal	Cumulative Interest	Ending Balance
249	31-Oct-08		2,500,000	23,535	17,132	6,403	1,419,487	1,200,698	1,080,513
250	30-Nov-08		2,500,000	23,535	17,232	6,303	1,436,719	1,207,001	1,063,281
251	31-Dec-08		2,500,000	23,535	17,333	6,202	1,454,052	1,213,203	1,045,948
252	31-Jan-09		2,500,000	23,535	17,434	6,101	1,471,486	1,219,305	1,028,514
253	28-Feb-09		2,500,000	23,535	17,535	6,000	1,489,021	1,225,304	1,010,979
254	31-Mar-09		2,500,000	23,535	17,638	5,897	1,506,659	1,231,202	993,341
255	30-Apr-09		2,500,000	23,535	17,741	5,794	1,524,399	1,236,996	975,601
256	31-May-09		2,500,000	23,535	17,844	5,691	1,542,243	1,242,687	957,757
257	30-Jun-09		2,500,000	23,535	17,948	5,587	1,560,191	1,248,274	939,809
257	31-Jul-09		2,500,000	23,535	18,053	5,482	1,578,244	1,253,756	921,756
248	31-Aug-09		2,500,000	23,535	18,158	5,377	1,596,402	1,259,133	903,598
258	30-Sep-09		2,500,000	23,535	18,264	5,271	1,614,666	1,264,404	885,334
259	31-Oct-09		2,500,000	23,535	18,371	5,164	1,633,037	1,269,569	866,963
260	30-Nov-09		2,500,000	23,535	18,478	5,057	1,651,514	1,274,626	848,486
261	31-Dec-09		2,500,000	23,535	18,586	4,949	1,670,100	1,279,576	829,900
252		Interest 07/1/2007 - 06/30/2008				\$87,847.49			
262		Interest 01/1/2009 - 12/31/2009				\$66,372.17			
252		Total Interest 07/1/2007 - 06/30/2008				\$185,681.65			
263		Total Interest 01/1/2009 - 12/31/2009				\$140,306.11			



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date

ATTACHMENT 2:
SEPTEMBER 2, 2009, REPORT OF ASHPAUGH & SCULCO, CPAs, PLC



ASHPAUGH & SCULCO, CPAs, PLC
Certified Public Accountants and Consultants

September 2, 2009

AS1011-15

Nicholas P. Miller, Esquire
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Avenue, N.W.
Suite 1000
Washington, DC 20036-4306

**SUBJECT: Addendum to the Review of the FCC Form 1240 of Comcast of Maryland, Inc.
Filed with Montgomery County, Maryland on or about October 1, 2008**

Dear Mr. Miller:

Ashpaugh & Sculco, CPAs, PLC ("A&S") provided our report of May 28, 2009 that set forth our recommended Maximum Permitted Rate determined from our recalculation of Comcast's filed FCC Form 1240. As explained in that letter report, the FCC requires using the latest published inflation rate. Since there is a newer inflation rate available, we are required to update our recalculated FCC Form 1240 using the 2.67% rate.

This change increases the MPR from \$18.59 to \$18.87. Revised Appendices A and B are attached that reflect this new MPR.

If you have any questions or require any further information, please let me know.

Very truly yours,

ASHPAUGH & SCULCO, CPAs, PLC

A handwritten signature in black ink, appearing to read 'Garth T. Ashpaugh', written over a horizontal line.

Garth T. Ashpaugh, CPA
President and Member

Cc: Marjorie L. Williams, Program Manager, Department of Technology Services,
Office of Cable and Communication Services, Montgomery County, Maryland

Enclosure

Addendum to 2008 1240 Report

APPENDIX A

MONTGOMERY COUNTY, MARYLAND
 COMCAST OF MARYLAND, INC.
 REVIEW OF 2008 FCC FORM 1240
 RECOMMENDED MAXIMUM PERMITTED RATE

Line No.	Type of Service	Maximum Permitted Rate Recommended For Approval	Franchise Fees	Recommended Rates Including Franchise Fees of 5.00%
1	<u>Monthly Rate</u> Maximum Permitted Rate - Basic Tier [A]	\$18.87	\$0.99	\$19.86

[A] The rate shown includes franchise-related costs of \$1.87 per subscriber excluding franchise fees (\$1.96 including franchise fees). Comcast identifies and itemizes an amount of \$1.50 for this on the subscriber's bill.

MONTGOMERY COUNTY, MARYLAND
COMCAST CABLEVISION OF POTOMAC, LLC
 REVIEW OF 2008 FCC FORM 1240
 COMPARISON OF CURRENT, COMCAST FILED & PROPOSED MAXIMUM PERMITTED RATES

Line No.	Type of Service	Rates Excluding Franchise Fees							Rates Including Franchise Fees of 5%						
		Current Rates [B]	Maximum Permitted Rated ("MPR") Rate Filed 10/1/2008	Operator Selected Rated ("OSR") Rate Filed 10/1/2008	A&S Determined Maximum Permitted Rate	Difference A&S & Current Rates [d-a]	Difference A&S & MPR Rates [d-b]	Difference A&S & OSR Rates [d-c]	Current Rates [B]	Maximum Permitted Rated ("MPR") Rate Filed 10/1/2008	Operator Selected Rated ("OSR") Rate Filed 10/1/2008	A&S Determined Maximum Permitted Rate	Difference A&S & Current Rates [k-h]	Difference A&S & MPR Rates [k-i]	Difference A&S & OSR Rates [k-j]
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)
1	<u>Monthly Rate</u>														
	Basic Tier [A]	\$19.31	\$20.65	\$19.31	\$18.87	(\$0.44)	(\$1.78)	(\$0.44)	\$20.33	\$21.74	\$20.33	\$19.86	(\$0.47)	(\$1.88)	(\$0.47)
	Percentage Change					-2.29%	-8.63%	-2.29%					-2.29%	-8.63%	-2.29%

[A] Including the FCC Regulatory Fee and franchise-related costs, referred to by Comcast as the PEG fee.

[B] Comcast increased the BST rate effective March 1, 2008.

ATTACHMENT 3: FINAL REPORT OF ASHPAUGH & SCULCO, CPAs, PLC



MONTGOMERY COUNTY EXECUTIVE ORDER

Offices of the County Executive • 101 Monroe Street • Rockville, Maryland 20850

Subject Set Cable Television Rates Pursuant to FCC Form 1240	Executive Order No. 209-09	Subject Suffix
Originating Department DTS- Office of Cable and Communication Services	Department Number 346001	Effective Date

ATTACHMENT 3:
FINAL REPORT OF ASHPAUGH & SCULCO, CPAs, PLC



ASHPAUGH & SCULCO, CPAs, PLC
Certified Public Accountants and Consultants

September 14, 2009

AS1011-15

Nicholas P. Miller, Esquire
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Avenue, N.W.
Suite 1000
Washington, DC 20036-4306

**SUBJECT: FCC Form 1240 of Comcast of Maryland, Inc. in Conformance With the
Proposed Settlement with Montgomery County, Maryland**

Dear Mr. Miller:

The attached Settlement FCC Form 1240 has been prepared by Ashpaugh & Sculco, CPAs, PLC ("A&S") to be consistent with the terms of the proposed settlement of the October 2008 rate filing of Comcast. It is our understanding that it reflects the terms of the proposed settlement.

If you have any questions or require any further information, please let me know.

Very truly yours,

ASHPAUGH & SCULCO, CPAs, PLC

A handwritten signature in black ink, appearing to read 'Garth T. Ashpaugh', written over a horizontal line.

Garth T. Ashpaugh, CPA
President and Member

Cc: Marjorie L. Williams, Program Manager, Department of Technology Services,
Office of Cable and Communication Services, Montgomery County, Maryland

Enclosure

Settlement Cover Letter

**FCC FORM 1240 DRAFT
UPDATING MAXIMUM PERMITTED RATES FOR REGULATED CABLE SERVICES**

Cable Operator:

Name of Cable Operator COMCAST OF POTOMAC, LLC		
Mailing Address of Cable Operator 20 WEST GUDE		
City ROCKVILLE	State MD	ZIP Code 20850

1. Does this filing involve a single franchise authority and a single community unit? YES NO

	X
--	----------

If yes, complete the franchise authority information below and enter the associated CUID number here:

2. Does this filing involve a single franchise authority but multiple community units? YES NO

X	
----------	--

If yes, enter the associated CUIDs below and complete the franchise authority information at the bottom of this page:

MD0057, MD0222, MD0223, MD0224, MD0225, MD0226, MD0227, MD0228, MD0229, MD0230, MD0231, MD0233, MD0234, MD0235, MD0236, MD0274, MD0275, MD0276, MD0277, MD0340, MD0341, MD0342, MD0343, MD0344, MD0345, MD0346, MD0347, MD0348 and MD0349
--

3. Does this filing involve multiple franchise authorities? NO

If yes, attach a separate sheet for each franchise authority and include the following franchise authority information with its associated CUID(s):

Franchise Authority Information:

Name of Local Franchising Authority MONTGOMERY COUNTY CABLE OFFICE		
Mailing Address of Local Franchising Authority 100 MARYLAND AVENUE, 3RD FLOOR		
City ROCKVILLE	State MD	ZIP Code 20850
Telephone number (240) 777-3636	Fax Number (240) 777-3770	

4. For what purpose is this Form 1240 being filed? Please put an "X" in the appropriate box.

a. Original Form 1240 for Basic Tier	
b. Amended Form 1240 for Basic Tier	X
c. Original Form 1240 for CPS Tier	
d. Amended Form 1240 for CPS Tier	

5. Indicate the one year time period for which you are setting rates (the Projected Period). TO

01/01/09	12/31/09
-----------------	-----------------

 (mm/yy)

6. Indicate the time period for which you are performing a true-up. TO

07/01/07	06/30/08
-----------------	-----------------

 (mm/yy)

7. Status of Previous Filing of FCC Form 1240 (enter an "x" in the appropriate box)

a. Is this the first FCC Form 1240 filed in any jurisdiction?	YES NO
	X
b. Has an FCC Form 1240 been filed previously with the FCC?	YES NO
	X

If yes, enter the date of the most recent filing: **11/20/98** (mm/dd/yy)

c. Has an FCC Form 1240 been filed previously with the Franchising Authority?	YES NO
	X

If yes, enter the date of the most recent filing: **10/01/07** (mm/dd/yy)

8. Status of Previous Filing of FCC Form 1210 (enter an "x" in the appropriate box)

	YES	NO
a. Has an FCC Form 1210 been previously filed with the FCC?	X	
	If yes, enter the date of the most recent filing: 10/02/95 (mm/dd/yy)	
	YES	NO
b. Has an FCC Form 1210 been previously filed with the Franchising Authority?	X	
	If yes, enter the date of the most recent filing: 10/02/95 (mm/dd/yy)	

9. Status of FCC Form 1200 Filing (enter an "x" in the appropriate box)

	YES	NO
a. Has an FCC Form 1200 been previously filed with the FCC?	X	
	If yes, enter the date filed: 09/06/94 (mm/dd/yy)	
	YES	NO
b. Has an FCC Form 1200 been previously filed with the Franchising Authority?	X	
	If yes, enter the date filed: 09/06/94 (mm/dd/yy)	

10. Cable Programming Services Complaint Status (enter an "x" in the appropriate box)

	YES	NO
a. Is this form being filed in response to an FCC Form 329 complaint?		X
	If yes, enter the date of the complaint: (mm/dd/yy)	

11. Is FCC Form 1205 Being Included With This Filing

	YES	NO
	X	

12. Selection of "Going Forward" Channel Addition Methodology (enter an "x" in the appropriate box)

Check here if you are using the original rules [MARKUP METHOD].

Check here if you are using the new, alternative rules [CAPS METHOD].

If using the CAPS METHOD, have you elected to revise recovery for channels added during the period May 15, 1994 to Dec. 31, 1994?

	YES	NO
		X

13. Headend Upgrade Methodology

**NOTE: Operators must certify to the Commission their eligibility to use this upgrade methodology and attach an equipment list and depreciation schedule.*

Check here if you are a qualifying small system using the streamlined headend upgrade methodology.

Part I: Preliminary Information

Module A: Maximum Permitted Rate From Previous Filing

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
A1	Current Maximum Permitted Rate	\$19,3858				

Module B: Subscribership

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
B1	Average Subscribership For True-Up Period 1	188,198				
B2	Average Subscribership For True-Up Period 2					
B3	Estimated Average Subscribership For Projected Period	188,198				

Module C: Inflation Information

Line	Line Description		
C1	Unclaimed Inflation: Operator Switching From 1210 To 1240		1.0000
C2	Unclaimed Inflation: Unregulated Operator Responding to Rate Complaint		1.0000
C3	Inflation Factor For True-Up Period 1 [Wks 1]		1.0182
C4	Inflation Factor For True-Up Period 2 [Wks 1]		
C5	Current FCC Inflation Factor		1.0267

Module D: Calculating the Base Rate

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
D1	Current Headend Upgrade Segment					
D2	Current External Costs Segment	\$2.9739				
D3	Current Caps Method Segment					
D4	Current Markup Method Segment	\$0.0700				
D5	Current Channel Movement and Deletion Segment	(\$2.0267)				
D6	Current True-Up Segment	\$1.7005				
D7	Current Inflation Segment	\$0.3518				
D8	Base Rate [A1-D1-D2-D3-D4-D5-D6-D7]	\$16.3162				

**Part II: True-Up Period
Module E: Timing Information**

Line	Line Description		
E1	What Type of True-Up Is Being Performed? (Answer "1", "2", or "3". See Instructions for a description of these types.) If "1", go to Module I. If "2", answer E2 and E3. If "3", answer E2, E3, E4, and E5.		2
E2	Number of Months in the True-Up Period 1		12
E3	Number of Months between the end of True-Up Period 1 and the end of the most recent Projected Period		6
E4	Number of Months in True-Up Period 2 Eligible for Interest		0
E5	Number of Months True-Up Period 2 Ineligible for Interest		0

Module F: Maximum Permitted Rate For True-Up Period 1

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
F1	Caps Method Segment For True-Up Period 1 [Wks 2]					
F2	Markup Method Segment For True-Up Period 1 [Wks 3]	\$0.0700				
F3	Chan Mvmt Deletn Segment For True-Up Period 1 [Wks' 4/5]	(\$2.0267)				
F4	True-Up Period 1 Rate Eligible For Inflation [D8+F1+F2+F3]	\$14.3595				
F5	Inflation Segment for True-Up Period 1 [(F4*C3)-F4]	\$0.261				
F6	Headend Upgrade Segment For True-Up Period 1 [Wks 6]					
F7	External Costs Segment For True-Up Period 1 [Wks 7]	\$3.1313				
F8	True-Up Segment For True-Up Period 1	\$1.8671				
F9	Max Perm Rate for True-Up Period 1 [F4+F5+F6+F7+F8]	\$19.6188				

Module G: Maximum Permitted Rate For True-Up Period 2

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
G1	Caps Method Segment For True-Up Period 2 [Wks 2]					
G2	Markup Method Segment For True-Up Period 2 [Wks 3]					
G3	Chan Mvmt Deletn Segment For True-Up Period 2 [Wks' 4/5]					
G4	TU Period 2 Rate Eligible For Inflation [D8+F5+G1+G2+G3]					
G5	Inflation Segment for True-Up Period 2 [(G4*C4)-G4]					
G6	Headend Upgrade Segment For True-Up Period 2 [Wks 6]					
G7	External Costs Segment For True-Up Period 2 [Wks 7]					
G8	True-Up Segment For True-Up Period 2					
G9	Max Perm Rate for True-Up Period 2 [G4+G5+G6+G7+G8]					

Module H: True-Up Adjustment Calculation

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Adjustment For True-Up Period 1						
H1	Revenue From Period 1	40,603,718.50				
H2	Revenue From Max Permitted Rate for Period 1	44,306,737.28				
H3	True-Up Period 1 Adjustment (H2-H1)	\$3,703,018.78				
H4	Interest on Period 1 Adjustment	\$428,306.20				
Adjustment For True-Up Period 2						
H5	Revenue From Period 2 Eligible for Interest					
H6	Revenue From Max Perm Rate for Period 2 Eligible For Interest					
H7	Period 2 Adjustment Eligible For Interest (H6-H5)					
H8	Interest on Period 2 Adjustment (See instructions for formula)					
H9	Revenue From Period 2 Ineligible for Interest					
H10	Revenue From Max Perm Rate for Period 2 Ineligible for Interest					
H11	Period 2 Adjustment Ineligible For Interest (H10-H9)					
Total True-Up Adjustment						
H12	Previous Remaining True-Up Adjustment	\$185,681.65				
H13	Total True-Up Adjustment [H3+H4+H7+H8+H11+H12]	\$4,317,006.63				
H14	Amount of True-Up Claimed For This Projected Period	\$4,317,006.63				
H15	Remaining True-Up Adjustment [H13-H14]	\$0.00				

Part III: Projected Period
Module I: New Maximum Permitted Rate

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
I1	Caps Method Segment For Projected Period [Wks 2]					
I2	Markup Method Segment For Projected Period [Wks 3]	\$0.0700				
I3	Chan Mvmt Deletn Segment For Projected Period [Wks 4/5]	(\$2.0267)				
I4	Proj. Period Rate Eligible For Inflation [D8+F5+G5+I1+I2+I3]	\$14.6205				
I5	Inflation Segment for Projected Period [(I4*C5)-I4]	\$0.3904				
I6	Headend Upgrade Segment For Projected Period [Wks 6]					
I7	External Costs Segment For Projected Period [Wks 7]	\$3.9573				
I8	True-Up Segment For Projected Period	\$1.9116				
I9	Max Permitted Rate for Projected Period [I4+I5+I6+I7+I8]	\$20.8798	\$20.6497	\$0.2301		
I10	Operator Selected Rate For Projected Period	\$19.3100				

Note: The maximum permitted rate figures do not take into account any refund liability you may have. If you have previously been ordered by the Commission or your local franchising authority to make refunds, you are not relieved of your obligation to make such refunds even if the permitted rate is higher than the contested rate or your current rate.

Certification Statement

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE TITLE 18, SECTION 1001), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements made in this form are true and correct to the best of my knowledge and belief, and are made in good faith.

Signature	Date
Filing Signed by Joseph C. Lance	10/01/08 (Revised 11/24/08)
Name and Title of Person Completing this Form:	Joseph C. Lance, Assitant Controller - Eastern Division
Telephone number	Fax Number
610-650-3057	610-650-2625

Worksheet 1 - True-Up Period Inflation

For instructions, see Appendix A of Instructions For FCC Form 1240

Line	Period	FCC Inflation Factor	
101	Month 1	1.03%	Jul-07
102	Month 2	1.03%	Aug-07
103	Month 3	1.03%	Sep-07
104	Month 4	2.45%	Oct-07
105	Month 5	2.45%	Nov-07
106	Month 6	2.45%	Dec-07
107	Month 7	2.68%	Jan-08
108	Month 8	2.68%	Feb-08
109	Month 9	2.68%	Mar-08
110	Month 10	1.11%	Apr-08
111	Month 11	1.11%	May-08
112	Month 12	1.11%	Jun-08
113	Average Inflation Factor for True-Up Period 1	1.0182	
114	Month 13		Jul-08
115	Month 14		Aug-08
116	Month 15		Sep-08
117	Month 16		Oct-08
118	Month 17		Nov-08
119	Month 18		Dec-08
120	Month 19		Jan-09
121	Month 20		Feb-09
122	Month 21		Mar-09
123	Month 22		Apr-09
124	Month 23		May-09
125	Month 24		Jun-09
126	Average Inflation Factor for True-Up Period 2		

Worksheet 3 - Markup Method True-Up Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
X	

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

12

Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Period	1	2	3	4	5	6	7
		Sum of Previous Regulated Channels	Sum of Current Regulated Channel	Average Channels	Per Channel Adjustment	Channels Added	Total Adjustment	Cumulative Adjustment
301	Previous Month							0.0700
302	Month 1	34	34	79.0	\$0.01	0	\$0.00	0.0700
303	Month 2	34	34	79.0	\$0.01	0	\$0.00	0.0700
304	Month 3	34	34	79.0	\$0.01	0	\$0.00	0.0700
305	Month 4	34	34	79.0	\$0.01	0	\$0.00	0.0700
306	Month 5	34	34	79.0	\$0.01	0	\$0.00	0.0700
307	Month 6	34	34	79.0	\$0.01	0	\$0.00	0.0700
308	Month 7	34	34	78.0	\$0.01	0	\$0.00	0.0700
309	Month 8	34	34	78.0	\$0.01	0	\$0.00	0.0700
310	Month 9	34	34	78.0	\$0.01	0	\$0.00	0.0700
311	Month 10	34	34	78.0	\$0.01	0	\$0.00	0.0700
312	Month 11	34	34	78.0	\$0.01	0	\$0.00	0.0700
313	Month 12	34	34	78.0	\$0.01	0	\$0.00	0.0700
314	Average Period 1 Markup Method Adjustment							0.0700
315	Month 13							
316	Month 14							
317	Month 15							
318	Month 16							
319	Month 17							
320	Month 18							
321	Month 19							
322	Month 20							
323	Month 21							
324	Month 22							
325	Month 23							
326	Month 24							
327	Average Period 2 Caps Method Adjustment							

Worksheet 3 - Markup Method Projected Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
	X

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

12

Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

0

Line	Period	1	2	3	4	5	6	7
		Sum of Previous Regulated Channels	Sum of Current Regulated Channel	Average Channels	Per Channel Adjustment	Channels Added	Total Adjustment	Cumulative Adjustment
301	Previous Month							\$0.07
302	Month 1	35	35	76.0	\$0.01	0	\$0.00	\$0.07
303	Month 2	35	35	76.0	\$0.01	0	\$0.00	\$0.07
304	Month 3	35	35	76.0	\$0.01	0	\$0.00	\$0.07
305	Month 4	35	35	76.0	\$0.01	0	\$0.00	\$0.07
306	Month 5	35	35	76.0	\$0.01	0	\$0.00	\$0.07
307	Month 6	35	35	76.0	\$0.01	0	\$0.00	\$0.07
308	Month 7	35	35	76.0	\$0.01	0	\$0.00	\$0.07
309	Month 8	35	35	76.0	\$0.01	0	\$0.00	\$0.07
310	Month 9	35	35	76.0	\$0.01	0	\$0.00	\$0.07
311	Month 10	35	35	76.0	\$0.01	0	\$0.00	\$0.07
312	Month 11	35	35	76.0	\$0.01	0	\$0.00	\$0.07
313	Month 12	35	35	76.0	\$0.01	0	\$0.00	\$0.07
314	Average Period 1 Markup Method Adjustment							\$0.0700

Worksheet 4 - Residual True-Up Period

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
X	

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Period One						
401	Average Permitted Charge	\$19.3858				
402	Average External Costs	\$2.9739				
403	Average Total Per Channel Adjustments after 5/14/94 for Channels Added Using Caps Method					
404	Average Tier Residual [401-402-403]	\$16.4119				
405	Average Channels per Regulated Tier	33.0000				
406	Average Caps Method Channels per Tier	0.0000				
407	Average Remaining Channels [405-406]	33.0000				
408	Average Period 1 Per Channel Residual [404/407]	\$0.4973				
Period Two						
409	Average Permitted Charge					
410	Average External Costs	\$3.1313				
411	Average Total Per Channel Adjustments after 5/14/94 for Channels Added Using Caps Method					
412	Average Tier Residual [409-410-411]					
413	Average Channels per Regulated Tier					
414	Average Caps Method Channels per Tier	0.0000				
415	Average Remaining Channels [413-414]					
416	Average Period 2 Per Channel Residual [412/415]					

Worksheet 4 - Residual Projected Period

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
	X

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Period One						
401	Average Permitted Charge	\$19.3858				
402	Average External Costs	\$2.9739				
403	Average Total Per Channel Adjustments after 5/14/94 for Channels Added Using Caps Method					
404	Average Tier Residual [401-402-403]	\$16.4119				
405	Average Channels per Regulated Tier	32.2849				
406	Average Caps Method Channels per Tier	0.0000				
407	Average Remaining Channels [405-406]	32.2849				
408	Average Period 1 Per Channel Residual [404/407]	\$0.5083				

Worksheet 5 - Channel Movement and Deletion True-Up Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
X	

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

	12
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Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Period	1 Residual of Channels Deleted From Tier	2 Residual of Channels Moved (added) to Tier	3 Net Per-Channel Cost Adjustment [Column 2 - Column 1]	4 Cumulative Net Per- Channel Cost Adjustment
501	Previous Period				(\$2.0267)
502	Month 1			\$0.0000	(\$2.0267)
503	Month 2			\$0.0000	(\$2.0267)
504	Month 3			\$0.0000	(\$2.0267)
505	Month 4			\$0.0000	(\$2.0267)
506	Month 5			\$0.0000	(\$2.0267)
507	Month 6			\$0.0000	(\$2.0267)
508	Month 7			\$0.0000	(\$2.0267)
509	Month 8			\$0.0000	(\$2.0267)
510	Month 9			\$0.0000	(\$2.0267)
511	Month 10			\$0.0000	(\$2.0267)
512	Month 11			\$0.0000	(\$2.0267)
513	Month 12			\$0.0000	(\$2.0267)
514	Average Period 1 Channel Movement and Deletion Adjustment				(\$2.0267)
515	Month 13				
516	Month 14				
517	Month 15				
518	Month 16				
519	Month 17				
520	Month 18				
521	Month 19				
522	Month 20				
523	Month 21				
524	Month 22				
525	Month 23				
526	Month 24				
527	Average Period 2 Channel Movement and Deletion Adjustment				

Worksheet 5 - Channel Movement and Deletion Projected Period, Basic Tier

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. Indicate the period for which this worksheet is being used. (Put an "X" in the appropriate box.)

True-Up Period	Projected Period
	X

Question 2. Indicate the tier for which this worksheet is being used. (Put an "X" in the appropriate box.)

Basic	Tier 2	Tier 3	Tier 4	Tier 5
X				

Question 3. How long is the first period, in months, for which rates are being set with this worksheet?

12
0

Question 4. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Period	1	2	3	4
		Residual of Channels Deleted From Tier	Residual of Channels Moved (added) to Tier	Net Per-Channel Cost Adjustment [Column 2 - Column 1]	Cumulative Net Per-Channel Cost Adjustment
501	Previous Period				(\$2.0267)
502	Month 1			\$0.0000	(\$2.0267)
503	Month 2			\$0.0000	(\$2.0267)
504	Month 3			\$0.0000	(\$2.0267)
505	Month 4			\$0.0000	(\$2.0267)
506	Month 5			\$0.0000	(\$2.0267)
507	Month 6			\$0.0000	(\$2.0267)
508	Month 7			\$0.0000	(\$2.0267)
509	Month 8			\$0.0000	(\$2.0267)
510	Month 9			\$0.0000	(\$2.0267)
511	Month 10			\$0.0000	(\$2.0267)
512	Month 11			\$0.0000	(\$2.0267)
513	Month 12			\$0.0000	(\$2.0267)
514	Average Period 1 Channel Movement and Deletion Adjustment				(\$2.0267)

Worksheet 7 - External Costs True-Up Period

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
X	

Question 1. For which time period are you filling out this worksheet? [Put an "X" in the appropriate box.]

Question 2. How long is the first period, in months, for which rates are being set with this worksheet?

12

Question 3. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Line Description	a	b	c	d	e
		Basic	Tier 2	Tier 3	Tier 4	Tier 5

Period 1

External Costs Eligible for Markup						
701	Cost of Programming For Channels Added Prior to 5/15/94 or After 5/15/94 Using Markup Method For Period	\$2,281,416.12				
702	Retransmission Consent Fees For Period					
703	Copyright Fees For Period	\$375,492.47				
704	External Costs Eligible For 7.5% Markup	\$2,656,908.59				
705	Marked Up External Costs	\$2,856,176.73				
External Costs Not Eligible for Markup						
706	Cable Specific Taxes For Period					
707	Franchise Related Costs For Period	\$4,074,277.62				
708	Commission Regulatory Fees For Period	\$141,148.50				
709	Total External Costs For Period	\$7,071,602.85				
710	Monthly, Per-Subscriber External Costs For Period 1	\$3.1313				

Period 2

External Costs Eligible for Markup						
711	Cost of Programming For Channels Added Prior to 5/15/94 or After 5/15/94 Using Markup Method For Period					
712	Retransmission Consent Fees For Period					
713	Copyright Fees For Period					
714	External Costs Eligible For 7.5% Markup					
715	Marked Up External Costs					
External Costs Not Eligible for Markup						
716	Cable Specific Taxes For Period					
717	Franchise Related Costs For Period					
718	Commission Regulatory Fees For Period					
719	Total External Costs For Period					
720	Monthly, Per-Subscriber External Costs For Period 2					

Worksheet 7 - External Costs Projected Period

For instructions, see Appendix A of Instructions For FCC Form 1240

True-Up Period	Projected Period
	X

Question 1. For which time period are you filling out this worksheet? [Put an "X" in the appropriate box.]

Question 2. How long is the first period, in months, for which rates are being set with this worksheet?

12
0

Question 3. How long is the second period, in months, for which rates are being set with this worksheet?

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
Period 1						
External Costs Eligible for Markup						
701	Cost of Programming For Channels Added Prior to 5/15/94 or After 5/15/94 Using Markup Method For Period	\$3,841,726.53				
702	Retransmission Consent Fees For Period					
703	Copyright Fees For Period	\$406,055.81				
704	External Costs Eligible For 7.5% Markup	\$4,247,782.34				
705	Marked Up External Costs	\$4,566,366.02				
External Costs Not Eligible for Markup						
706	Cable Specific Taxes For Period					
707	Franchise Related Costs For Period	\$4,214,583.73				
708	Commission Regulatory Fees For Period	\$156,204.34				
709	Total External Costs For Period	\$8,937,154.08				
710	Monthly, Per-Subscriber External Costs For Period 1	\$3.9573				

FRC per Sub per month

1.866201078

Worksheet 8 - True-Up Rate Charged

For instructions, see Appendix A of Instructions For FCC Form 1240

Question 1. How long is the True-Up Period 1, in months?

12

Question 2. How long is the True-Up Period 2, in months?

Line	Line Description	a Basic	b Tier 2	c Tier 3	d Tier 4	e Tier 5
801	Jul-07	\$17.3200				
802	Aug-07	\$17.3200				
803	Sep-07	\$17.3200				
804	Oct-07	\$17.3100				
805	Nov-07	\$17.3100				
806	Dec-07	\$17.3100				
807	Jan-08	\$17.3100				
808	Feb-08	\$17.3100				
809	Mar-08	\$19.3100				
810	Apr-08	\$19.3100				
811	May-08	\$19.3100				
812	Jun-08	\$19.3100				
813	Period 1 Average Rate	\$17.9792				

814	Jul-08					
815	Aug-08					
816	Sep-08					
817	Oct-08					
818	Nov-08					
819	Dec-08					
820	Jan-09					
821	Feb-09					
822	Mar-09					
823	Apr-09					
824	May-09					
825	Jun-09					
826	Period 2 Average Rate					